

FINAL DRAFT

CONFIDENTIAL

III. ENERGY MANAGEMENT PLAN FOR THE PUEBLO OF LAGUNA

All footnotes to this section are listed at the end of the section
(pages III-71 and III-72) except where specifically indicated.



9491842

POL-EPA01-0001185

INTRODUCTION

The energy management plan presented in this section is intended for use by the Pueblo of Laguna as it formulates and implements an energy development and management strategy. The plan begins with general matters and then moves into increasingly specific items:

- A. Goals and objectives
- B. Energy management strategy
- C. Recommended management activities
 - Planning
 - Review uranium revenue forecasts and track uranium prices
 - Collect and automate land and mineral resource information
 - Evaluate potential for new enterprises
 - Development decisions
 - Establish proposal review procedures for resource exploration and development
 - Conduct review of proposed operating and reclamation plans
 - Provide technical assistance to Governor, Pueblo Council, and lawyers in negotiations
 - Monitoring and enforcement
 - Develop program to check on mine safety and miner health
 - Design and conduct environmental field tests
 - Prepare technical review of reports

- Make independent inventory and check on assays and other reports
- Establish an audit program to reconcile payments and production records

- General management

- Develop procedures for control over technical information processing and distribution
- Report regularly to Pueblo Council and Governor
- Develop Tribal decision makers' energy management training program

D. Implementation plan

- Organizational responsibilities
- Timing
- Staff/consulting responsibilities
- Cost/financing sources

Attachment A: Description of Anaconda's physical flow of ore from Jackpile-Paguate Mine

Attachment B: Description of Anaconda's document flow for the royalty payment to the Pueblo of Laguna

A. GOALS AND OBJECTIVES

Based on discussions with the Governor and Pueblo*/ staff members, Ernst & Ernst prepared a list of energy development goals (Exhibit III-1). Implementation of a minerals management plan should contribute to achieving these goals.

Objectives to achieve each goal are also listed (Exhibit III-2). In order to manage energy resources effectively, that is, to progress toward the goals, the Pueblo should orient its specific management activities around the objectives. Progress in implementing the plan presented below can be evaluated in terms of achievement of these objectives.

*/ The terms Pueblo and Tribe (or Tribal) are used interchangeably throughout this report.

EXHIBIT III-1

PROPOSED GOALS FOR THE PUEBLO OF LAGUNA

A. Economic Development

1. To maximize potential revenues to the Pueblo from uranium, coal, geothermal, and other energy production.
2. To provide a stable income and long-term investment opportunities to the Pueblo through phased development of mineral resources.

B. Employment

1. To maximize employment opportunities for Tribal members.
2. To provide stable job opportunities for Tribal members through phased development of resources.

C. Environmental Protection

1. To minimize surface damage and environmental pollution.
2. To improve the environmental quality of areas being reclaimed.

D. Tribal Management Capability

1. To ensure Tribal self-determination in energy resource development decisions.
2. To improve the Tribe's capacity to manage resource development activities.
3. To increase the Tribe's management responsibilities in monitoring and controlling energy development.

EXHIBIT III-2
OBJECTIVES (SHOWN BY GOAL)

Goal A.1: To Maximize Income from Production

- Objective: To use financial provisions in contracts which:
 - ensure that the Tribe benefits from increases in the market value of its resources
 - ensure that the Tribe is paid for any other minerals of commercial value that are mined with uranium
- Objective: To ensure compliance with lease and/or contract terms
- Objective: To obtain accurate and timely receipt of all payments due the Pueblo.

Goal A.2: To Provide Long-Term Income from Production

- Objective: To plan phased development of tribal mineral resources
- Objective: To invest revenues generated by production in projects that will promote the Pueblo's economic base.

Goal B.1: To Maximize Employment Opportunities

- Objective: To include "hire Laguna" clauses (with training provisions) in all new leases or contracts

EXHIBIT III-2 (Cont.)

- Objective: To monitor and enforce hiring and training provisions.

Goal B.2: To Stabilize and Increase Employment Opportunities

- Objective: To provide diversified employment opportunities for Tribal members in both energy and non-energy related enterprises
- Objective: To plan phased development of minerals resources that will provide job opportunities over the longer term
- Objective: To require companies developing Tribal resources to provide training and job opportunities for upwardly mobile positions.

Goal C.1: To Minimize Surface Damage and Pollution

- Objective: To monitor exploration and development activities to ensure that environmentally sound mining practices are being followed
- Objective: To require exploration and development plans to provide for minimizing impacts on tribal villages and resources:
 - non-energy mineral resources
 - grazing lands
 - water quality (surface and groundwater)
 - air quality
 - wildlife.

Goal C.2: To Improve Environmental Quality

- Objective: To reclaim abandoned mine sites, rights-of-way, and roads
- Objective: To monitor reclamation activities.
- Objective: To monitor health and safety conditions at the mines.

EXHIBIT III-2 (Cont.)

Goal D.1: To Ensure Tribal Self-Determination

- Objective: To formulate a clearly defined policy for development of energy resources
- Objective: To strengthen the Pueblo's internal base of knowledge and information needed to make informed development policy decisions on an on-going basis
- Objective: To maintain the confidentiality of, and control over, critical information.

Goal D.2: To Improve Management Capacity

- Objective: To obtain all information needed to make informed decisions
- Objective: To systematize Tribal records on ownership, leases, permits, and production
- Objective: To train Tribal members in skills needed to manage resource development and implement Tribal policy.

Goal D.3: To Increase Participation in Monitoring and Controlling Development

- Objective: To determine the appropriate mix of Tribal and Department of the Interior management activities
- Objective: To administer and enforce all Tribal ordinances relating to energy development
- Objective: To take prompt action on matters involving violations of regulations or contract terms.

B. ENERGY MANAGEMENT STRATEGY

In pursuing the goals and objectives described above, the Pueblo must adopt a general approach or management philosophy that reflects Tribal perceptions of how these objectives can best be met. There are three basic options available to the Pueblo, as discussed in Volume II of the Planning Manual:

- Continue current levels of activity (Management Model I)
- Press the Department of the Interior (DOI) for better execution of trust responsibilities-- mining and reclamation plan review, inspections, and enforcement--supplementing DOI activities where needed (Management Model II)
- Replace DOI as the responsible agent for minerals management (Management Model III).

The Model I approach would result in lessening Pueblo control over resources as more exploration is begun, as more development proposals are received, as existing mining operations continue, and eventually as mine reclamation is undertaken. The need for increased management activity can be met initially by a Model II approach: seeking improvements in DOI execution of trust responsibilities, along with increased Tribal involvement in resource management through the minerals office. In light of the Pueblo's desire to assume increasing control over its own affairs, Model III is the most appropriate course of action over the long term. This

model should be implemented to the fullest extent possible while recognizing the continuing trust responsibilities of DOI. However, it is not possible to create a fully developed minerals management capability overnight, so in the short run the Pueblo may find it necessary to continue utilizing DOI and other agency assistance while developing internal capabilities. It is with this general approach, or management strategy, that a proposed energy management plan has been prepared for the Pueblo.

Attaining the goals and objectives listed in Exhibits III-1 and III-2 requires the Pueblo of Laguna to have a minerals policy that reflects the general management strategy. Without such a policy, development decisions will continue to be made by the Pueblo Council on an ad hoc basis that may change each time a new Council and Governor take office.

In order to implement the policy, the Pueblo should develop procedures by which the Council makes decisions concerning various phases of the mineral development process. These procedures should include, but not necessarily be limited to:

- Issuing exploration and development contracts
- Reviewing of exploration and development plans
- Involvement in the environmental impact statement (EIS) process
- Developing year-end annual reports on mineral development activities with recommendations for use by Council members and the Governor as well as minerals office staff
- Developing a Tribal decision makers' energy management training program.

The primary implementing area should be a Land and Mineral Resources Office (LMRO) as described in Part C that follows. The LMRO, once created, will

be responsible for implementing and expanding a program currently being developed and managed by the Tribal Business Manager in cooperation with the Tribal Secretary, Legal Assistant, and the Governor.

C. RECOMMENDED ENERGY MANAGEMENT ACTIVITIES

The set of energy management activities described in Section II was modified in meetings with Tribal officials to develop a set of energy management activities that could be pursued in the near-term. The mutually agreed upon energy management activities are shown in Exhibit III-3.

Letters in the right-hand column of Exhibit III-3 indicate the organizational units in the Tribe that would be involved in each energy management activity. These responsibilities were formulated by assessing several factors:

- The nature of the activity
- The capacity of existing organizational units in the Tribe
- The potential for changes in the Tribe's organizational structure.

The Pueblo's current organizational chart is included as Exhibit III-4 with the placement of the proposed LMRO shown in the upper right hand corner (dotted lines). The major change recommended is to shift primary energy management from an ad hoc basis within the Governor's Office to a formal basis in LMRO, reporting to the Governor. The Pueblo is currently acting on this recommendation and will soon have selected a Minerals Director. After the LMRO is well established, it should be attached to the Business Manager's Office. Eventually the LMRO would become a line division within the Business Manager's Office.

RECOMMENDED ENERGY MANAGEMENT ACTIVITIES

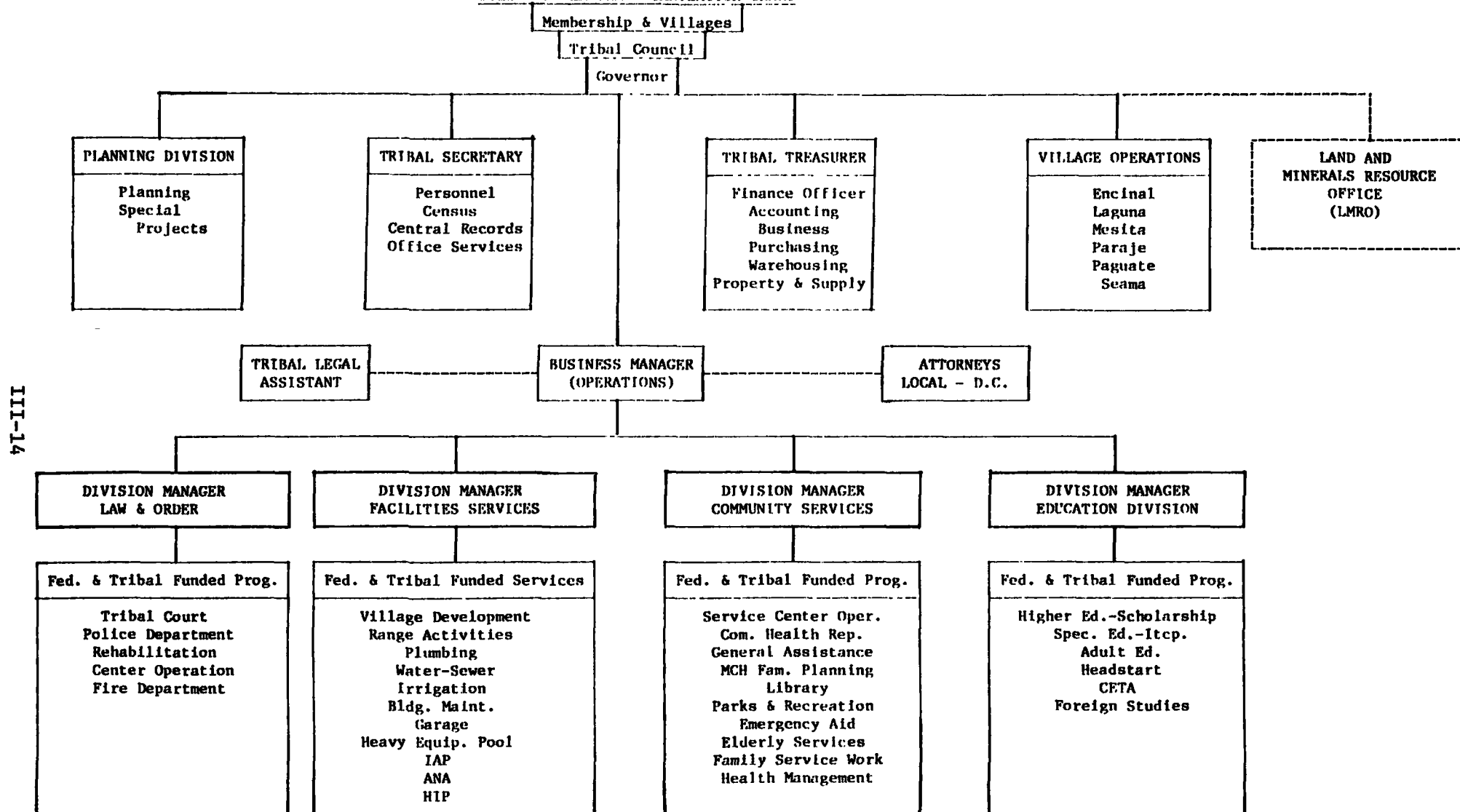
<u>ACTIVITY</u>	<u>ORGANIZATIONAL UNIT(S) RESPONSIBLE</u>
<u>Planning</u>	
1. Review Uranium Revenue Forecasts and Track Uranium Prices	A,C,E
2. Collect and Automate Land and Mineral Resource Information	A,C,D
3. Evaluate Potential for New Enterprises	A,B,E,F
<u>Development Decisions</u>	
4. Establish Proposal Review Procedures for Resource Exploration and Development	A,E,F
5. Conduct Review of Proposed Operating and Reclamation Plans	A,E
6. Provide Technical Assistance to Governor, Pueblo Council, and Lawyers in Negotiations	A
<u>Monitoring and Enforcement</u>	
7. Develop Program to Check on Mine Safety and Miner Health	A
8. Design and Conduct Environmental Field Tests	A
9. Prepare Technical Review of Reports	A
10. Make Independent Inventory and Check on Assays and Other Reports	A
11. Establish an Audit Program to Reconcile Payments and Production Records	A,C
<u>General Management</u>	
12. Develop Procedures for Control over Technical Information Processing and Distribution	A,B,C,D,E,F
13. Report Regularly to Pueblo Council and Governor	A
14. Develop Tribal Decision Makers' Energy Management Training Program	A

KEY

A = Land and Mineral Resources Office
 B = Governor's Office
 C = Treasurer's Office
 D = Secretary's Office
 E = Planner's Office
 F = Business Manager's Office

EXHIBIT 111-4

PUEBLO OF LAGUNA ORGANIZATION CHART



The LMRO Director should be responsible for performing a full range of management functions, from planning to supervising the work of others. Although he may have one or several full-time staff persons, the Director should also share control over staff working in other offices (Accounting, Central Records, and Planning). Staff members from these other departments should be assigned (on a permanent, part-time basis) to the Minerals Office.

In order to implement this approach, two essential items must be addressed:

- A specific staff person from each appropriate department should be assigned to the Minerals Office
- An agreement should be reached between the Minerals Director and appropriate department directors on the percentage of time that each person assigned to the Minerals Office from another department is to devote to Minerals Office activities (for example, approximately 1-2 days per week each from an Accounting staff person and a Central Records staff person; at least 1 day per week from a Tribal planning staff person).

In addition to the department staff, technical support for the Minerals Office should be available through the Governor's Office in the legal and financial areas (from the Tribal Attorney and the Business Manager). The LMRO Director should report directly to the Governor and through the Governor to the Council. The LMRO Director should advise and work closely with the Governor, the Council, and any special committees created by the Council.

In the remainder of this section, each activity listed in Exhibit III-3 is discussed in greater detail. The following format is used:

- Organizational responsibilities
- Specific steps (subactivities) required
- Timing
- Staff/consulting requirements₁/
- Costs/potential funding.₂/

All of the activities are considered high priority by the Pueblo, and several are already under way. Because the specifics of intermediate and long-term activities will depend on the outcome of these short-term activities, it is not possible to provide specifics on less immediate activities at this time. As events unfold, it will be the responsibility of the organizational units indicated to carry forward the energy management planning process for these later activities.

PLANNING ACTIVITIES

ACTIVITY NO. 1--REVIEW URANIUM REVENUE FORECASTS AND TRACK URANIUM
PRICES

Organizational Responsibilities

The responsibility for revenue forecasting and monitoring of uranium prices should reside in the Land and Mineral Resources Office (LMRO). Liaison would be maintained with the Tribal Treasurer's Office and Planning Division because of the related responsibilities of these two units of government.

Actions Required

Future royalty revenues should be forecast for both short-term (e.g., monthly for the next 12-month period) and long-term (e.g., annual for the next 5-10 years) periods. Data for both forecasts would be provided primarily by the mining company, drawing from sales contracts, with general trends in uranium markets (demand, supply, price, regulatory policy) being obtained from trade publications and uranium market specialists. The selection of an outside source or sources of advice on general trends in the uranium market will depend upon the types of information presently available from the U.S. Department of Energy and trade publications. If one or more investment brokers or other financial analysts specialize in the uranium field, the LMRO Director should consider subscription to their services and/or retaining them as outside experts. In addition, the LMRO should be prepared to market uranium from royalties paid in-kind in future years.

Timing

An initial revenue forecasting system relying at first solely on company data should be developed as rapidly as possible. The system could

be augmented within six months to incorporate the addition of outside information. If the system proves to be valuable and receives widespread use, computerization should be given serious consideration using available translating systems.3/

Staff/Consultant Requirement

Once the system is designed, a staff person from the LMRO should be able to operate it spending no more than two days per month. As indicated above, outside expertise may be required to provide the LMRO staff with additional data on trends in uranium markets.

Costs/Potential Funding

The out-of-pocket expenses for the system would consist of the cost of subscriptions to trade publications, the cost of retaining an outside expert and/or subscribing to his specialized service, and the cost of computerization (programming, storage, updating data files, use) if that is desired.

ACTIVITY NO. 2--COLLECT AND AUTOMATE LAND AND MINERAL RESOURCE
INFORMATION

Organizational Responsibilities

Responsibilities for a computerized resource information system would initially be split up but coordinated by a project leader. Until the LMRO Director is selected, the major responsibility should be with the Tribal Secretary. The Governor should appoint a member of his staff as project leader. That person should work with external design and operations consultants. The function would be assigned to the LMRO Director when that person is hired.

Once the system design is complete, responsibility should be identified for data gathering and checking, and for operation of the system.^{4/} Data collection and maintenance of files would be the responsibility of the LMRO. A trained staff member would be primarily responsible for maintaining the integrity of data and source documents feeding the system.

Actions Required 5/

The steps necessary to implement a computerized land and minerals resource information system are:

1. Conceptual Design. Working with external consultants, the Tribe would define the desired scope and operational mode of the system. A general system specification would be prepared indicating the extent of data to be retained, the objectives and use of the system, the general cost, and resources to be required.
2. Plan of Implementation. The Governor would appoint a project leader (to be replaced by the LMRO Director when hired) for the implementation period. He, working with external consultants knowledgeable of computerized land data base processing techniques, would set out a project plan that would identify timing, personnel to be assigned, and physical resources required.

3. Design Activity. Here, the detailed system design would be prepared. A highly specialized professional group working with a Tribal employee should be engaged to do the design work because of the technical complexity and required knowledge of data base processing techniques. This activity would, as output, document the methodology, input mode, and output reports possible from the system. A more refined estimate of system costs would be prepared.
4. Software Development. An external software firm should be selected. The software contractor would begin programming and testing of required programs.
5. Data Collection. Tribal employees would do research on land areas as well as assemble data on leases and production. This has already been started by interns hired by the Governor in the summer of 1978.

Timing

The Pueblo of Laguna needs to contract with external consultants who specialize in data base processing techniques for the design of the Land and Minerals Resource Information System. Coordination between the Tribal Records Committee and the external consultants would be the responsibility of the assigned project leader. This team would then be responsible for incorporating all of the desired information and reports into the system's design. Once the design has been finalized, Laguna will need to contract with a computer programming firm. All data collection activities should be conducted by existing Tribal employees.

Staff/Consultant Requirements

The Governor can start the coordination of Pueblo members toward the design of the computerized Land and Minerals Resource Information System immediately by assigning a project leader. Once selection of an outside consultant has been made, design efforts should take approximately two months, after which a computer software firm should be employed. The

software coding, testing, and debugging will probably take at least three months. All of the necessary data collection could be completed while the system is being programmed so that no additional time is taken before implementation. The output would include a systems manual, users manual, all computer programs, and a training session for prospective users and key Pueblo executives.

Costs/Potential Funding

External design consultants could cost (b) (4). The desired software will probably cost (b) (4) to purchase or develop.

ACTIVITY NO. 3--EVALUATE POTENTIAL FOR NEW ENTERPRISES

Organizational Responsibility

The responsibility for this activity should rest jointly with several groups:

1. The Offices of the Governor and Treasurer. The Governor and Treasurer should play a major role in shaping the Pueblo's investment strategy and making major enterprise development decisions.
2. The Business Manager's Office. The Business Manager has particular expertise in enterprise development and management.
3. The Land and Mineral Resources Office. As the lead agency in energy development, the LMRO should assume a lead role in developing proposals and working with potential energy developers to determine which types of enterprises would yield a positive benefit/cost ratio to the Pueblo and its members.
4. The Planning Division. As the overall planning body of the Pueblo with an interest in maintaining a rational land use policy, environmental policy, "boom town" assessments, and so forth.

The Council should also be involved through its business enterprise committee and work jointly with a task force composed of representatives of the above four groups.

Actions Required

Some of the specific energy development areas are considered:

(1) coal development, (2) further uranium development and related activities, (3) geothermal, (4) oil and gas, (5) solar, and (6) energy development related to water use. For example, as the profile provided in the Preface indicates, the Pueblo has (b) (4). However,

it is felt that there may be (b) (4) on the reservation, and some exploration has taken place. In this regard, the LMRO should:

- Coordinate with the USGS and BIA on Phase II of the minerals inventory now in process
- Monitor trends in the coal industry, particularly demand and price information related to low-sulfur western coal
- Consider undertaking a limited exploration program to determine (b) (4) (b) (4).

With respect to uranium-related activities, Anaconda presently contracts for certain services at the Jackpile-Paguate mine. A primary example is a privately owned company that is contracted by Anaconda to remove overburden from the open-pit mine. The Pueblo should investigate the types of support activities that could spin-off from the Anaconda mine and Conoco property (should the proposal be approved) and consider establishing one or more of the required enterprises. The Director of the LMRO would play the lead role in identifying potential activities, and the Business Manager would have the responsibility for assessing the feasibility of the proposed enterprises.

Timing

These activities should be undertaken immediately as part of the Pueblo's overall planning and development program.

Staff/Consultant Responsibilities

The director of the LMRO and Business Manager would have primary responsibility for this activity, with active support from the Planning Division and direct liaison with the Governor's Office. Outside geological

expertise may be required if an independent program of exploration is undertaken.

Costs/Potential Funding

The staff costs would be absorbed in budgets of existing departments. A independent exploration program would be expensive, and attempts to secure useful results from the USGS-BIA inventory should be made before going forward with such a program. Outside sources of funding for such a program could be sought from the BIA and from mining companies that are seeking exploration permits. Federal funding for energy-impacted communities should also be sought to develop plans and evaluate the impacts of specific projects being considered.

DEVELOPMENT DECISIONS

ACTIVITY NO. 4--ESTABLISH PROPOSAL REVIEW PROCEDURES FOR RESOURCE
EXPLORATION AND DEVELOPMENT

Organizational Responsibilities

This responsibility should be shared by the LMRO, the Business Manager, and the Planning Division. The three groups have a responsibility to deal with land use planning and related issues.

Actions Required

The Pueblo currently receives unsolicited proposals for exploration on a frequent, yet random basis. A formal procedure needs to be established for submission of such proposals (proposal form and content, to whom proposals are to be sent), review of proposals, a decision process pertaining to acceptance/rejection or need for more information, informing proposing parties of the results of an initial screening, need for personal appearance by company representatives, and so forth. At the same time, should the Pueblo actively seek proposals for exploration and eventually resource development, a formal set of procedures would have to be adopted, building off the system presently used by the BIA. The series of steps involved would include selection of tracts, preparation of a request for proposals (RFPs), procedures for reviewing RFPs, formal bid openings, and contractor selection. Once an agreement is executed, formal monitoring procedures would have to be adopted.

Timing

Procedures for dealing with unsolicited proposals should be developed in the immediate future. Procedures for actively soliciting proposals should be developed after the former activity is completed and in

full consultation with the BIA Realty Office.

Staff/Consultant Responsibilities

Staff actively involved in the process would include:

- LMRO engineer as task leader
- Planning Division physical planner to review proposals for land use and environmental impacts
- Business Manager to review proposals from an economic feasibility perspective
- Legal analysis on compliance with laws and regulations including analyzing legal constraints on development.

A formal evaluation of each proposal should be submitted to the Governor and Council for approval. For proposals accepted, quarterly progress reports should also be submitted to the Governor and Council committee concerned with minerals exploration and development.

Cost/Potential Funding

It is recommended that a fee be established for any company submitting an unsolicited proposal to defray the costs of processing and reviewing the request. If the Pueblo develops a solicitation procedure of its own, the costs would be built into the budgets of the respective departments involved and accounted for directly. It would then be possible, if the Pueblo chooses, to allocate a portion of exploration permit fees and bonus payments received to the exploration accounts of the individual departments to offset the staff time spent and expenses incurred.

ACTIVITY NO. 5--CONDUCT REVIEW OF PROPOSED OPERATING AND RECLAMATION
PLANS

Organizational Responsibilities

This responsibility will again be based in the LMRO in liaison with the Planning Division's environmental review responsibilities.

Activities Required

As described in Volume II of the Planning Manual, the establishment of a mining activity requires the submission of a detailed mining operations plans, a highly technical document. Presently, Conoco has submitted a detailed plan for its proposed uranium mine to the USGS, and a formal committee of the Council is reviewing the plan directly with representatives of Conoco with BIA staff involved pursuant to their lease approval responsibilities. The LMRO Director, or a trained mining engineer on his staff, should play an active role in reviewing the mining plans and serving as an intermediary between the Council committee and the company representatives. The BIA staff person should participate in the negotiations and provide comments as they apply to BIA responsibilities.

Timing

This activity should be an immediate priority of the LMRO Director.

Staff/Consultant Requirements

Because of the intensive nature of the review process, the Director should either employ an outside consultant to review the Conoco plans or hire a full-time mining engineer to serve on his staff, depending upon the total workload requirements (e.g., Conoco, plus plan revisions

being submitted by Anaconda, plus the expectation that plans will be prepared and submitted by other companies in the future).

Cost/Potential Funding

If a full-time staff person is retained, his salary and fringe benefits would be prorated depending upon the number of hours devoted to this project. An annual salary of (b) (4) should be anticipated.6/ If an outside consultant is used for the Conoco plan evaluation, fees could range from (b) (4) per day, plus expenses.

ACTIVITY NO. 6--PROVIDE TECHNICAL ASSISTANCE TO THE GOVERNOR, PUEBLO
COUNCIL, AND TRIBAL ATTORNEYS IN CONTRACT NEGOTIATIONS

Organizational Responsibilities

The LMRO should be the unit primarily responsible for providing this form of technical assistance.

Actions Required

The Director of LMRO will be responsible for retaining the services of specialists in this area and for building an in-house capability. Areas of proficiency required were described in detail in Volume II of the Ernst & Ernst Planning Manual covering contractual arrangements. Some of the specific areas of concern to be addressed in negotiations with any company desiring to engage in development activities on the reservation include:

- Royalty payment terms
- Profit sharing/joint venture provisions
- Tribal employment opportunities
- Employee health and safety plans
- Environmental protection
- Labor relations
- Reclamation plans.

The Planning Manual describes important negotiating points to consider in each of these areas and also addresses such topics as negotiating strategies and tactics.

Timing

The provision of technical assistance would be an ongoing

activity, with peak activity occurring when a specific proposal is being considered. There is also a relationship between this activity and the evaluation of the potential for new enterprises in that a portion of the latter involves a careful assessment of contract terms if an outside party is involved.

Staff/Consultant Requirements

The Pueblo should have its staff attorney participate in contract negotiations along with the Pueblo's law firms. In addition, the Pueblo may want to retain specialists to assist in conducting specific negotiations and drafting model agreements.

Cost/Sources of Funds

The cost of this activity would emanate from two sources: (1) training costs for existing staff ((b) (4) for attendance at special seminars, travel, purchase of library materials, etc.), and (2) retaining expert legal advice (b) (4)).

MONITORING AND ENFORCEMENT

ACTIVITY NO. 7--DEVELOP PROGRAM TO CHECK ON MINE SAFETY AND MINER HEALTH

Organizational Responsibilities

The LMRO should be the unit responsible for this activity.

Activities Required

As described in Section II of this document, the Mining Safety and Health Administration (MSHA) field office in Albuquerque will be fully staffed to handle this function by July 1, 1979. A good working relationship exists between MSHA, the Pueblo, and Anaconda. Major activities include:

1. Review of mine construction and operations
2. Sampling of workers for exposure to dust, radiation, and noise
3. Air quality sampling for NO_x, H₂S, and SO₂ at the mine.

A report is sent to the company with a copy transmitted to the Pueblo. Two inspections per year were performed in 1978 and prior years; however, the staff additions will enable inspections to be conducted quarterly in the future. The LMRO may want to hire and train a person to accompany the MSHA inspectors on their quarterly inspections and gain a full understanding of the process. The Laguna inspector can then follow-up if any violations are indicated in the report submitted by MSHA to the company to ensure that corrective action is taken.

Timing

A person should be hired and trained to accompany MSHA representatives on their next inspection. Each inspection is expected to

take 3-5 weeks for one inspector at a large underground mine and 3-5 weeks for two inspectors at a large surface mine. If the inspections are conducted sequentially, the process could take as many as 10 calendar weeks per inspection, or 40 weeks per year. If it is presumed that they are conducted concurrently by 2-3 inspectors, field work would require up to 20 weeks per year. The LMRO director would have to develop a work program for MSHA that makes sense given these requirements.

Staff/Consulting Responsibilities

This function would be performed by the LMRO inspector in conjunction with staff from the MSHA field office in Albuquerque.

Cost/Financing Sources

The salary of an inspector would fall in the (b) (4) per year range, plus fringe benefits and overhead.^{7/} Other costs would include the purchase of special clothing and transportation to the mine site. Since the work load (in the field) is estimated to be less than a full person year (20-40 weeks), the inspector could also conduct the environmental tests described under the next activity (Activity No. 8).

ACTIVITY NO. 8--DESIGN AND CONDUCT ENVIRONMENTAL FIELD TESTS

Organizational Responsibilities

The LMRO should be the lead organization for this activity. The Pueblo has essentially three organizational options:

1. Develop a cooperative program with the State of New Mexico Environmental Improvement Division (NMEID), the unit designated by the EPA to implement Federal air and water quality standards
2. Seek designation of the Pueblo by EPA as the implementation unit for Pueblo lands
3. Develop environmental codes at least as stringent as the Federal standards, monitor the program, and enforce it using appropriate legal remedies.

While NMEID is the EPA-designated agency in New Mexico, it has no authority over the Pueblo of Laguna reservation. Consequently, no formal monitoring programs exist for the reservation at present. While it is recognized that the Pueblo and NMEID have not had a good working relationship in the past, alternative (1) above is recommended in the short-term, while alternatives (2) and (3) should be considered after a full-scale environmental program is operational and the benefits and costs have been assessed.

Activities Required

Initially, the LMRO Director and the Governor should establish liaison with the NMEID, which is in the process of establishing a statewide water quality monitoring program as described in Section II of this document. As described in the previous activity, air quality monitoring around the mine is presently handled by the MSHA. Federal standards for hazardous (e.g., radioactive mill tailings) and solid waste disposal have not yet been established but would probably be the NMEID's

responsibility. As a result, a full-scale program would involve developing air and water quality monitoring programs and similar programs for disposal of solid and hazardous wastes in the near future.

Timing

This activity should be phased in as a mining safety inspector/environmental technician is retained by the director of the LMRO.

Staff/Consultant Responsibilities

The inspector/technician should be hired by the LMRO to work with the NMEID in establishing a water quality monitoring network. The Pueblo should consider purchasing laboratory and field equipment to conduct its own tests if it desires to check on the NMEID's efforts. Ultimately, the Pueblo could be in a position to operate its own program when it develops the sophistication and purchases the equipment required.

Cost/Potential Funding

The cost for a mining safety inspector/environmental technician would be (b) (4) per year plus fringe benefits and overhead.^{8/} Expenses would include transportation and special equipment purchased. The person hired would divide his or her time between this activity and the mining safety activity (Activity No. 7).

ACTIVITY NO. 9--PREPARE TECHNICAL REVIEW OF REPORTS

Organizational Responsibilities

The LMRO would be responsible for this activity.

Activities Required

Technical review of reports filed by MSHA, IHS, NMEID, and USGS would be performed by appropriate LMRO staff. Reports pertain primarily to:

- Miner health and mine safety
- Air quality monitoring
- Water quality monitoring
- Disposal of solid and hazardous wastes
- Exploration reports
- Mining plans
- Reclamation plans
- USGS reports on mining activities
- IHS studies and reports.

Timing

Reviews would be performed as reports are received. The LMRO director would include a summary of findings in his periodic report to the Governor and Council.

Staff/Consulting Responsibilities

LMRO staff would perform those reviews pertaining to their respective functions. The LMRO director would review the reports and work with the staff on an action plan if problems are detected. The LMRO

director would also provide written reports to the Governor periodically and discuss problems that occur and possible responses to them with the Governor. as required.

Cost/Potential Financing

The costs are shared with the other functions described under the Monitoring and Enforcement section.

ACTIVITY NO. 10--MAKE INDEPENDENT INVENTORY AND CHECK ON ASSAYS AND OTHER
REPORTS

Organizational Responsibilities

The responsibility should rest with the Director of the Land and Mineral Resources Office (LMRO). The Director will be a trained mining engineer with uranium mining experience and will be able to comprehend the intricate steps this function entails. The Director will also be able to determine whether the Pueblo should develop the assaying expertise in-house, retain expert consultants, or use some combination of the two.

Actions Required

Appendices A and B contain a detailed discussion of the physical flow of ore from the Jackpile-Paguate mine and the flow of royalty payment to the Pueblo. The specific types of actions suggested by the physical and dollar flow processes are as follows:

1. Checking mine ore manifest and shipping lot reports at the Jackpile-Paguate mine.
2. Taking independent ore samples at the mine to check the ore content against the company's records.
3. Checking the weight tickets at the Bluewater processing plant and verifying the moisture content and dry weight of the ore. The calculated dry weight is the official tonnage upon which Laguna is paid a royalty.
4. Checking the slurry formed at the grinding (or ball) mill. The sample taken at the mill and chemically assayed is the official measure for the Pueblo's base royalty payment.
5. Checking the assay reconciliation made between the mill and the processing (enrichment) plant. An independent umpire is utilized when the results of the two assays do not fall within certain limits.

6. For "overflow" ore sent to the Kerr-McGee ball mill, the same checking procedure should be used as described under (5) above.
7. The same checking procedures should be used for the Sohio mill as described under (6) and (5) above for the Kerr-McGee facilities.
8. Monitor Anaconda's inventory control system pertaining to Kerr-McGee and Sohio toll mills.

As a general rule, the Director of the LRMO or his representative(s) should be involved in all eight steps of the above process. For example, he should receive a copy of the form used to record the weight of each ore lot delivered. He should also undertake an independent, random sampling program at each stage in the process and compare results with those of Anaconda and/or the purchasing utility company at different stages in the process.

Timing

Only after the LRMO Director has been selected and has had time to become familiar with the mining operations on the Lagune Reservation can an accurate Request For Proposals (RFP) be prepared for independent assay assistance. Approximately three months after the Director of the Minerals Office starts work with the Pueblo, he should be able to prepare the necessary RFP. Completed proposals should be expected one month after the RFP has been sent out. An assay implementation time schedule should be a part of each completed proposal. One possibility is to spend 1-2 months designing and field testing the assay program and then operate it intensively for one month and analyze the results. If significant discrepancies are found at certain points in the process, a more selective program can be continued. If no major discrepancies are found, a reduced, random spot check program can be continued.

Staff/Consultant Requirments

The LMRO Director, who will have experience in all aspects of uranium mining, should coordinate this activity. Initially, the Director of the Laguna Minerals Office should prepare an RFP to contract with geological consultants for assaying ore samples. The RFP should detail the frequency of assays and should request an estimate for consulting fees regarding the processing possibilities of any mineral by-products found in the ore samples. Selection of a consulting assay firm should be recommended by the new Minerals Office Director to the Governor and the Tribal Council. The Minerals Office Director or his designate should periodically be present at truck and railroad car weighings. These observations should be unannounced and at random intervals.

Cost/Funding Sources

The cost of this activity could be substantial if the Pueblo stations people at each of the facilities involved (or contracts with an independent assaying company to provide the service).^{9/} There are at least four locations involved: (1) Jackpile-Paguate mine; (2) Anaconda's Bluewater mill; (3) Sohio's mill, and (4) the Kerr-McGee ball mill and ore enrichment facility. Once the intensive test program is conducted, the cost-effectiveness will have to be assessed to determine a future course of action.

ACTIVITY NO. 11--ESTABLISH AN AUDIT PROGRAM TO RECONCILE PAYMENTS AND
PRODUCTION RECORDS

Organizational Responsibilities

Establishing a monthly internal audit program should be the primary responsibility of the Pueblo's Accounting Office. All necessary accounting records should be maintained in that department. The audit procedures designed to evaluate production statistics should be superseded by an independent assay program that would be supervised by the LMRO, once it is established. Reconciliation of production figures to accounting figures should be the responsibility of the Accounting Office in coordination with the LMRO. Results should be reported to the LMRO Director so that he can relate them to the general planning activity of forecasting future uranium revenues and selling prices.

Actions Required

The necessary steps to audit the mining payments and production values are listed below:

1. Receive phone notification from the mining company indicating the royalty check was wire-transferred to the Tribe's designated depository. Enter the date on the monthly audit check-off sheet.
2. Follow-up immediately with the mining company if the payment is not made on schedule.
3. Reconcile the payment amount received by the bank to the amount on the statement of ore valuation and royalty due.
4. Recheck the mathematical calculations on the statement of ore valuation and royalty due and reconcile the value per ton, adjustment factors, and royalty percentage to the lease.
5. Recheck the calculations on the detail of ore removed, weighed, and sampled. Reconcile the wet weight pounds, percent H₂O, dry weight pounds, percent U₃O₈, and

pounds U3O8 to the statement of ore valuation and royalty due.

6. Reconcile the selling price and pounds of yellowcake sold to the mining company's sales invoices.
7. Prepare the mining company's royalty report and contact appropriate personnel at the mining company to provide explanations of significant differences. Prepare a written analysis of significant changes from prior months.
8. Submit the royalty report and any supporting analysis to the Director of the LMRO and to the Governor.

Even after the Minerals Office has been established and an independent assay program has been implemented, monthly production statistics should be reconciled by the accountant.

Annual audits should be conducted by an independent firm of Certified Public Accountants (CPA's). The parties should select a CPA firm, and a copy of all audit correspondence should be sent to the Director of LMRO. The scope of the annual audit on a company's operations should be limited to the company's operations on the Pueblo of Laguna Reservation. Accounting and auditing functions may have to be modified for any subsequent mining operations (uranium or other minerals).

After the annual audit is performed, the Pueblo Accounting Office would compare the findings to those of the Pueblo's internal audit. If discrepancies are noted, the Pueblo has the option of retaining its own CPA's to reconcile the differences.

Timing

The recommended audit activities can and should be initiated immediately.

Staff/Consulting Requirements

Development and implementation of an internal audit program will require the addition of a staff person to the Accounting Office.

Cost/Potential Funding

The accountant's annual salary would be (b) (4) If
the Pueblo conducts its own audit, that expense (b) (4)
(b) (4) would be
additional.

GENERAL MANAGEMENT

ACTIVITY NO. 12--DEVELOP PROCEDURES FOR CONTROL OVER TECHNICAL
INFORMATION PROCESSING AND DISTRIBUTION

Organizational Responsibilities

Information requests should be screened by the Tribal Secretary, and referred to the appropriate party. The Pueblo's technical data base should be secured in the office of the Tribal Secretary within the central records system.

Activities Required

The basic activity required is to develop the system. The system will require a record keeper to track information requests and the paper flow generated. It will also require participation by several Tribal offices. One important aspect of the system will be to develop procedures for classifying certain types of information and controlling access to, and use of, this information. Once the system is developed, it will have to be submitted to the Governor and Council for approval.

1. Possible steps involved in processing information could include:

- All requests referred to the Governor's Office and screened by the Tribal Secretary
- For non-sensitive requests, refer to appropriate department director
- For sensitive requests, require request in writing; clear with Governor; refer to appropriate department director
- If the Governor does not want to reply, determine whether information is in public domain or Federal agency making request has legal right to information; refer back to the Governor for disposition

- Establish log to record all requests (date, person inquiring, nature of request) and monitor referral process (date and to whom referred, date response sent, copy of response in central files)
2. Guaranteeing data security would include:
- Keep all sensitive records under lock and key in Central Records Unit
 - Establish formal check-out and check-in procedure
 - Do not allow reproduction unless copies are also secured in approved location (e.g., in the LMRO Director's office for certain documents being used regularly by that office)
 - Do not store unprotected data with timesharing service bureau if computations or displays are being developed; use storage method (disk/tape) that can be kept in the Pueblo office.

Timing

The systems should be established under direction of the Governor's Office and the Tribal Secretary as soon as possible.

Staff/Consultant Responsibilities

The Governor's Office and the Tribal Secretary will have responsibility for the systems; the LMRO Director will be responsible for keeping land and mineral data current.

Cost/Financing Sources

Costs for the information processing system should be minimal (document control folders and slips; filing cabinet space; time spent by the Governor's Office). Costs for the record keeping system would consist of a safe and/or locked filing cabinets and a recording log.

ACTIVITY NO. 13--REPORT REGULARLY TO GOVERNOR AND PUEBLO COUNCIL

Organizational Responsibilities

This responsibility is borne by the LMRO Director.

Activities Required

The LMRO Director should submit a brief monthly report and detailed quarterly report to the Governor covering:

- Planning
- Development decisions
- Monitoring and enforcement
- General management activities.

Special reports would be provided in writing when the circumstances warrant. As described under other activities, the Governor's Office will be playing a direct role in:

- Evaluating potential for new enterprises
- Responding to information requests

The Governor will then be responsible with the LMRO Director for submitting reports to the full Council and special Council committees.

Timing

The regular reporting process should be initiated as soon as the LMRO Director is hired.

Staff/Consultant Responsibilities

The LMRO Director is solely responsible for this activity, working with his staff to put reports together.

Cost/Financing Sources

This cost is part of the budget for the Director's Office.

ACTIVITY NO. 14--DEVELOP TRIBAL DECISION MAKERS' ENERGY MANAGEMENT
TRAINING PROGRAM

Organizational Responsibilities

This responsibility should be borne by the LMRO Director.

Activities Required

An energy management training program is needed for both elected officials and Tribal employees concerned with energy matters. The program should consist of background material on the Pueblo's history in energy resource development and non-technical sections covering planning, development decisions, and monitoring and enforcement decisions. Written materials should be developed, and seminars (1-2 days) should be scheduled annually for new elected officials and periodically for new professional staff members as they are hired.

Timing

This activity should be initiated as soon as the LMRO Director is hired.

Staff/Consultant Responsibilities

The LMRO Director and his staff (as they are hired) will be responsible for this activity. Outside consultants could be used to put special sections together. Outside services may be required for graphics.

Cost/Financing Sources

The initial cost should not exceed (b) (4). Additional costs would be incurred as the materials are modified and/or more copies are printed.

D. IMPLEMENTATION PLAN

The implementation plan for the Pueblo of Laguna's energy management plan has been developed from the individual activity analyses contained in Part C. The components of the implementation plan are as follows:

1. Organizational Responsibilities. Exhibit III-5 summarizes the responsibilities of Tribal organizational units for the activities described in Section C. A "P" denotes primary area of responsibility, while an "S" denotes a support role as identified in the activity work-up provided in Part C.
2. Timing. Exhibit III-6 presents the time-phasing of activities by year and quarter through 1980.
3. Staff/Consulting Responsibilities. Exhibit III-7 summarizes, by task, staffing and consulting requirements of the Land and Mineral Resources Office (LMRO), the primary implementation arm of Tribal government, to implement the program. Exhibit III-8 contains a position description for the LMRO Director, the highest hiring priority for the Tribe in its set of activities. Other staff positions suggested by the activity analysis provided in Part C and summarized in Exhibit III-7 include:
 - o A planner/environmental analyst to direct development and maintenance of the land and mineral resource information system and assist the Director in several other activity areas
 - o A surface specialist/environmental technician to direct mining safety and environmental field test programs

- o An accountant to conduct the internal audit program and participate in planning and management activities that include a financial component.

In addition, a second senior level mining engineer (qualifications similar to the Director's) would have to be hired if the Pueblo ultimately wanted to operate its own sampling and assaying program (staff would also be required). Finally, the Tribal Accountant will also assume significant responsibilities under the program. These are detailed in Exhibit III-9. Training requirements and resources available for specific positions described in Exhibit III-7 can be obtained from Volume IV of the Planning Manual.

4. Cost/Financing Sources. Exhibit III-10 summarizes the specific cost elements that would be added to the Tribal budget (by administrative unit) from the short-term plan if fully implemented. Dollar figures are provided where they can be estimated with some degree of accuracy (based on the material contained in Part C).
5. Budget for the LMRO. Exhibit III-11 provides a tentative budget estimate for the LMRO in its first year of operations drawing from the salary information provided in Part C and the cost elements listed in Exhibit III-10.

The overall basis for determining the success of the implementation plan will be the degree to which it helps the Pueblo of Laguna meet its objectives and attain its overall goals as described in Part A above. To reiterate, the Tribe's primary goals and objectives pertain to:

- Economic development (level and stability of Tribal income)
- Employment
- Environmental protection
- Tribal management capacity.

The LMRO will have to monitor its efforts toward attaining these goals and objectives on a continuous basis and perhaps use the reports submitted periodically to the Pueblo Council and Governor as a means of informing Tribal officials of progress made.

EXHIBIT 111-5

SUMMARY OF ORGANIZATIONAL RESPONSIBILITIES

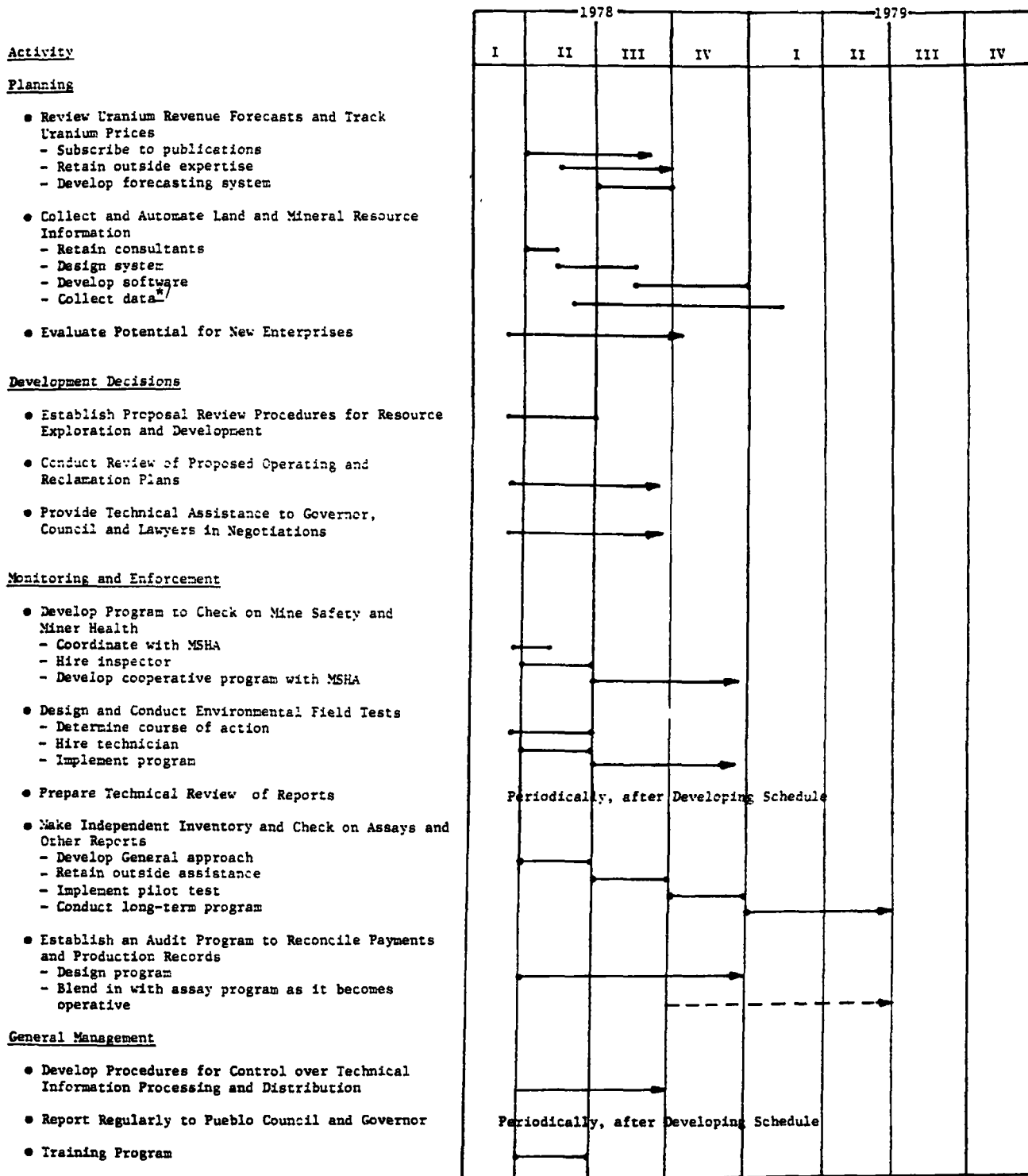
Activity	Land & Mineral Resources Office (A)	Governors Office (B)	Treasurer's Office (C)	Secretary's Office (D)	Planner's Office (E)	Business Manager's Office (F)
<u>Planning</u>						
1. Review Uranium Revenue Forecasts & Track Uranium Prices	P	-	S	-	S	-
2. Collect and Automate Land & Mineral Resource Information	P	-	S	P, S ^{1/}	-	-
3. Evaluate Potential for New Enterprises	S	P	-	-	S	P
<u>Development Decisions</u>						
4. Establish Proposal Review Procedures for Resource Exploration and Development	P	-	-	-	S	S
5. Conduct Review of Proposed Operating & Reclamation Plans	P	-	-	-	S	-
6. Provide Technical Assistance to Governor, Pueblo Council and Lawyers in Negotiations	P	-	-	-	-	-
<u>Monitoring and Enforcement</u>						
7. Develop Program to Check on Mine Safety and Miner Health	P	-	-	-	-	-
8. Design & Conduct Environmental Field Tests	P	-	-	-	-	-
9. Prepare Technical Review of Reports	P	-	-	-	-	-
10. Make Independent Inventory and Check on Assays and Other Reports	P	-	-	-	-	-
11. Establish an Audit Program to Reconcile Payments and Production Records	S	-	P	-	-	-
<u>General Management</u>						
12. Develop Procedures for Control over Technical Information Processing and Distribution	S	P	S	S	S	S
13. Report Regularly to Pueblo Council and Governor	P	-	-	-	-	-
14. Develop Tribal Decision Makers' Energy Management Training Program	P	S	-	-	-	S

Letters underneath each administrative unit provide a cross-reference to Exhibits 4 and 5.

"P" indicates primary unit responsible; "S" indicates secondary responsibility.

^{1/} Primary responsibility until LMRO Director is hired.

TIME-PHASING OF ACTIVITIES



Roman numerals indicate quarter of calendar year.

* / Some data already collected by interns during summer of 1978.

EXHIBIT III-7

STAFFING/CONSULTING REQUIREMENTS OF LAND AND MINERAL RESOURCES
OFFICE TO IMPLEMENT PROGRAM

ACTIVITY	STAFF	CONSULTANTS
<u>Planning</u> 1. Review Uranium Revenue Forecasts and Track Uranium Prices	Director and Tribal Accountant: Design system (2 person weeks) Staff Member: 2 days per month to operate	Outside expertise to provide uranium market information Computer programmer (under contract) if system is to be automated
2. Collect and Automate Land and Mineral Resource Information	Director: Overall responsibility Staff Member: Work with consultants to design system; responsible for operating and maintaining system Interns: Continue work begun in summer 1978	Consultants required to design system and develop software.
3. Evaluate Potential for New Enterprises	Director works with other high-level Tribal officials chaired by Business Manager.	None immediately; possibly used to conduct feasibility studies in future

III-55

EXHIBIT III-7 (CONT.)
STAFFING/CONSULTING REQUIREMENTS OF LAND AND MINERAL RESOURCES
OFFICE TO IMPLEMENT PROGRAM

ACTIVITY	STAFF	CONSULTANTS
<u>Development Decisions</u> 4. Establish Proposal Review Procedures for Resource Exploration and Development	Director: Coordinates with Business Manager and Planner to establish procedures Staff: Review proposals as they are received	None
5. Conduct Review of Proposed Operating and Reclamation Plans	Director: Coordinates with Environmental Staff in Planner's office Staff: Review operating plans as they are received	Possibly retained in short-term to review Conoco's plans
6. Provide Technical Assistance to Governor, Pueblo Council, and Lawyers in Negotiations	Director and staff work with Tribal Attorney and Tribe's lawyers.	Specialists retained for negotiations and drafting model agreements as needed

95-III-56

EXHIBIT III-7 (CONT.)
STAFFING/CONSULTING REQUIREMENTS OF LAND AND MINERAL RESOURCES
OFFICE TO IMPLEMENT PROGRAM

III-57

ACTIVITY	STAFF	CONSULTANTS
<u>Monitoring and Enforcement</u> 7. Develop Program to Check on Mine Safety and Miner Health	Director: Coordinates program with MSHA Staff: Inspector hired to work with MSHA 20-40 weeks per year	None
8. Design and Conduct Environmental Field Tests	Director: Establishes program and coordination procedures Staff: Inspector/technician conducts tests in coordination with mining safety responsibilities	None
9. Prepare Technical Review of Reports	Director: Overall responsibility Staff: Conduct reviews	None

EXHIBIT III-7 (CONT.)
STAFFING/CONSULTING REQUIREMENTS OF LAND AND MINERAL RESOURCES
OFFICE TO IMPLEMENT PROGRAM

ACTIVITY	STAFF		CONSULTANTS
10. Make Independent Inventory and Check on Assays and Other Reports	Director:	Designs and coordinates program	Consulting firm required to help design program and conduct pilot test; possible long-term retention to continue program
	Staff:	Would assist Director, if program is ultimately going to be run in-house, Senior Engineer and field staff would have to be hired	
11. Establish an Audit Program to Reconcile Payments and Production Records	Director:	Works with Tribal Accountant to develop program	CPA firm conducts audits
	Staff:	Accounting office hires staff person to implement	

III-58

EXHIBIT III-7 (CONT.)

STAFFING/CONSULTING REQUIREMENTS OF LAND AND MINERAL RESOURCES
OFFICE TO IMPLEMENT PROGRAM

ACTIVITY	STAFF		CONSULTANTS
<u>General Management</u>	Director:	Coordinates with Tribal Secretary	None
12. Develop Procedures for Control over Technical Information Processing and Distribution	Staff:	Respond to requests as Director delegates	
13. Report Regularly to Pueblo Council and Governor	Director:	Prepares report	None
	Staff:	Assist Director	
14. Develop Tribal Decision Makers' Energy Management Training Program	Director:	Develops Program	Possible use of consultant(s) to prepare selected material
	Staff:	Assist Director	

III-59

EXHIBIT III-8
POSITION DESCRIPTION

Job Title: Director--Land and Mineral Resources Office (LMRO)

Guidance Received: Incumbent is under the general supervision of the Pueblo Governor, who gives guidance on a continuing basis and who is generally available to furnish direction and guidance on matters of an unusual nature. The incumbent performs much of his day-to-day work on his own initiative and reacts to the problems or opportunities confronting the LMRO.

I. DUTIES AND RESPONSIBILITIES

A. General Management

1. Directs the activities of the LMRO staff; evaluates performance of staff.
2. Advises the Pueblo Governor and Council on decisions concerning mineral resource development. Prepares background material for use in explaining energy resource issues, opportunities, and conflicts.
3. Formulates resource development goals, plans, and policies for Tribal Council consideration; implements upon approval; periodically evaluates performance against planned targets.
4. Represents program interests and concerns on Pueblo committees or authorities.
5. Coordinates programs and activities with other units of Pueblo government, state and regional agencies, and relevant Federal agencies; serves as major link between Pueblo and outside energy-related groups.
6. Develops a familiarity with Federal and state agency responsibilities regarding oversight/inspection of resource development activities. Coordinates Pueblo efforts with the following agencies:

EXHIBIT III-8 (Cont.)

- Bureau of Indian Affairs (BIA)
 - U.S. Geological Survey (USGS)
 - Bureau of Mines (BOM)
 - Mining Safety and Health Administration (MSHS)
 - Environmental Protection Agency (EPA)
 - Nuclear Regulatory Commission (NRC)
 - State of New Mexico Environmental Improvement Division (NMEID)
 - New Mexico State Engineer.
7. Periodically inspects reservation boundaries to insure that mining operations adjacent to reservation boundaries are not causing environmental problems on Pueblo lands.
 8. Interprets and evaluates existing data on Pueblo energy resources (back copies of exploration data in USGS files, company reports, etc.). Identifies potential areas for exploration or permit sales.
 9. Analyzes information on alternative types of energy-related development (e.g., uranium milling, in situ leaching); estimates the type and scale of development that could be supported by the Tribe's mineral deposits; drafts plans for phased development of resources.
 10. Subscribes to technical journals and publications from relevant government agencies and maintains a basic understanding of new technologies and developments.
 11. Maintains up-to-date information on Environmental Protection Agency, Department of Energy, and Nuclear Regulatory Commission regulation status and changes affecting uranium and other minerals. Also monitors proposed legislation.

B. Contract and Negotiation Activities

1. Maintains contact with companies interested in exploration/extraction leases.
2. Prepares feasibility studies for new energy development opportunities. Coordinates the activities of Pueblo-employed consultants to perform preliminary geological studies and environmental studies as required.

EXHIBIT III-8 (Cont.)

3. Assists the Pueblo attorney in preparing the lease offering, including:
 - Tract selection
 - Mining practices
 - Monitoring requirements
 - Royalty methodology
 - Pueblo employment practices
 - Environmental issues
 - Exploration plans
4. Assists the Pueblo attorney in evaluation and selection of qualified bidders.
5. Evaluates all bids and presents recommendations to the Council.
6. Assists the Pueblo attorney in negotiating the specific terms of the contract.
7. Coordinates the awarding and approval of leases, contracts, and other arrangements with the BIA, USGS, and successful bidders. This task includes preparation of Tribal Council resolutions and securing of approval letters and advice from the appropriate governmental agencies.
8. Reviews the environmental impact statements or assessments in detail and prepares an analysis of the effects on the Pueblo for the Governor and Council (the assistance of an environmental consultant may be required).

C. Exploration Activities

1. Reviews in detail the exploration plans. Coordinates the use of the geological consultants as required.
2. Evaluates and recommend changes of exploration plans to the Council (if required). Advises the Governor on negotiating changes with the exploration company.
3. Obtains copies of exploration information from the exploration company such as:
 - Assay results

EXHIBIT III-8 (Cont.)

- Drill hole maps
 - Geological data
 - Radiometric probe data
 - Geological cross sections
 - Feasibility studies
 - Reserve calculations
 - Hydrology tests
 - Seismic tests.
4. Reviews and analyzes the geological data with outside geological consultants (as required) and prepares progress reports for the Governor and Council.
 5. Obtains actual core samples for independent assay and evaluation.
 6. Conducts periodic inspections of the area under exploration for compliance with lease and exploration plans. Prepares narrative reports.
 7. Reviews agency inspection reports and takes follow-up action to assure that reported problems are corrected. Coordinates Pueblo input and advise in approving of mining and reclamation plans by USGS.

D. Production Activity

1. Reviews the operating plans in detail and prepares an analysis of the effects on the Pueblo for the Governor and Council (the assistance of a mining engineer consultant may be required).
2. Reviews and analyzes all correspondence between the mining company and USGA related to Items 1 and 2 above.
3. Meets with the Council to explain the operating plans and environmental reports.
4. Follows the environmental impact statement approval procedure and takes action as necessary to speed up BIA & USGS approval.
5. Conducts or directs qualified staff to conduct periodic visits to the mine area to assure that:
 - The mining plans are being followed
 - Workmanship is done professionally

EXHIBIT III-8 (Cont.)

- Sound mining practices are being followed
- Sound conservation practices are being followed.

Prepares narrative reports and reports any violations to the appropriate governmental agency having jurisdiction such as the USGS or EPA.

6. Attends Pueblo committee meetings regarding employee practices and grievances.
7. Reviews all correspondence related to the mining activities from Anaconda, BIA, USGS, EPA, MSHA, etc. and takes action as required.
8. Analyzes and interprets reports received from Anaconda, USGS, MSHA, etc. for the Governor and Council. Follows up on action taken as a result of citations by agencies conducting inspections.
9. Reviews the results of the accountant's auditing/monitoring function and takes action as required.
10. Coordinates the activities of the Pueblo-employed environmental consultant in monitoring reclamation activities.
11. In conjunction with the Pueblo attorney, performs periodic reviews of contract provisions to determine whether renegotiations are needed. Assists in negotiating terms of new contracts and renegotiating terms of existing agreements.
12. Oversees sampling program for independent assay and evaluation.
13. Maintains current information on the market prices of uranium yellow cake from publications.
14. Maintains files on USGS and MSHA inspections, letters to operators citing problems and/or violations, and follow-up action taken.
15. Evaluates and interprets pollution control monitoring reports from EPA, MSHA, IHS, NMEID, and Anaconda air quality samplers.
16. Monitors reclamation activities.
17. Follow-up on action taken as a result of citations by agencies conducting inspections.

EXHIBIT III-8 (Cont.)

II. REPORTING RELATIONSHIPS

- Reports directly to the Governor
- Works closely with the Business Manager, Accountant, Tribal Secretary and Planning Division
- Maintains liaison with Pueblo Attorney and Outside Council
- Maintains liaison with Federal agencies listed above, key state and local government agencies, and private sector. Groups other than those listed above include the Four Corners Regional Commission, the Middle Rio Grande Council of Governments, and the New Mexico Mineral Resources Office.

III. QUALIFICATIONS

- Advanced degree or equivalent in mining engineering
- At least 10 years of experience in all phases of surface and underground uranium mining.

IV. SALARY

- Estimated at (b) (4) per year, plus fringe benefits.

EXHIBIT III-9
POSITION DESCRIPTION

Job Title: Tribal Accountant (Mineral Office Duties)

Guidance Received: Incumbent is under the direct guidance of the Finance Officer and Tribal Treasurer. However, the incumbent is responsible for providing accounting and financial services to the minerals office and therefore will also receive direction and guidance from the Director--Land and Mineral Resources Office (LMRO).

I. DUTIES AND RESPONSIBILITIES

A. Administrative Functions

1. Advises the Director--LMRO, the Governor, and the Council on developments or problems related to the accounting for royalty payments. Prepares appropriate training and briefing materials.
2. Prepares special analyses and financial reports for the LMRO.
3. Coordinates the financial activities of the LMRO with the Pueblo CPA's, BIA, USGS, and Anaconda.
4. Helps maintains the lands record management system by recording additions, changes, or deletions to the records.
5. Maintains files of accounting related records including:
 - Anaconda's royalty payment support documents
 - Land/mineral ownership records
 - Written reports prepared by the minerals office accountant
 - Correspondence to/from Anaconda, auditors, USGS, BIA, etc.

B. Monitoring Functions

Performs the daily, monthly, and periodic monitoring functions outlined in the monitoring activity number 11.

EXHIBIT III-9 (Cont.)

C. Planning Functions

1. Reviews and analyzes all development proposals and changes in existing contracts in conjunction with other LMRO staff and advises the Director and Governor of the financial impact.
2. Works with the Director in preparing and revising the minerals office budget.
3. Works with the outside auditors to plan and schedule the annual audit of Anaconda's royalty accounting.
4. Meets periodically with Anaconda's management to review the company's forecasted production and sales expectations.

EXHIBIT III-10
SUMMARY OF MAJOR COST ELEMENTS INCURRED IN IMPLEMENTING
SHORT-TERM ENERGY MANAGEMENT PLAN^{1/}

Activity	Description of Cost Element
<u>Planning</u>	
1. Review Uranium Revenue Forecasts and Track Uranium Prices	<ul style="list-style-type: none"> • [REDACTED] (b) (4) • [REDACTED] (b) (4) • [REDACTED] (b) (4)
2. Collect and Automate Land and Mineral Resource Information	<ul style="list-style-type: none"> • [REDACTED] (b) (4) • [REDACTED] (b) (4)
<u>Development Decisions</u>	
5. Conduct Review of Proposed Operating and Reclamation Plans	<ul style="list-style-type: none"> • [REDACTED] (b) (4) • Budget could be established for outside review of future plans
6. Provide Technical Assistance to Governor, Pueblo Council, and Lawyers in Negotiations	<ul style="list-style-type: none"> • Possible budget for outside specialists
<u>Monitoring and Enforcement</u>	
7. Develop Program to Check on Mine Safety and Miner Health	<ul style="list-style-type: none"> • Utility vehicle and testing equipment

^{1/} Costs are identified only for activities that involve significant expenditures over and above the salaries of the LMRO Director and his staff as they are hired.

EXHIBIT III-10 (Cont.)

Activity	Description of Cost Element
8. Design and Conduct Environmental Field Tests	• Utility vehicle (pro rate share) and testing equipment
10. Make Independent Inventory and Check on Assays and Other Reports	• Maximum of (b) (4) p.a.--based on unsolicited consultant proposal
<u>General Management</u>	
12. Develop Procedures for Control over Technical Information Processing and Distribution	• (b) (4)

EXHIBIT III-11

FIRST-YEAR BUDGET FOR
LAND AND MINERAL RESOURCES OFFICE

LABOR

Director (Mining Engineer)
Planner/Environmental Analyst
Surface Specialist/
Environmental Technician
Accountant*/
Secretarial (1)
Clerical (1)
Fringe Benefits (@ \$2,500 per employee)

(b) (4)

Subtotal

(b) (4)

OTHER**/

Office Rental
Equipment Purchase/Rental
- Motor Vehicles
- Office
- Testing
- Computer (pro rata share)
Travel & Per Diem
Publications
Office Supplies
Training
Outside Contractual
Services

(b) (4)

(b) (4)

Subtotal

TOTAL

*/ Assigned to Treasurer's Office

**/ Cannot generally be estimated without more
detailed feasibility study

FOOTNOTES

SECTION III

- 1/ Assistance in some areas may be available in the near future from the Council of Energy Resource Tribes (CERT). While the Pueblo of Laguna should maintain liaison with CERT, it is not possible to predict the nature and extent of available assistance from CERT at this time. As a result, this form of assistance has not been built into the energy management strategy.
- 2/ Funding for all activities should be sought both from the BIA, which is responsible for seeing that the proposed activities are carried out under the trust responsibility, and from other sources. The Indian Self-Determination Act (PL93-638) provides for BIA funding of these types of activities while turning over management responsibilities to the Tribe.
- 3/ While computerization is involved in several of the energy management activities, it should be emphasized that the activities should be undertaken whether or not the Pueblo purchases a computer. Computerization is recommended in most cases because of the volume of data to be collected, stored, and processed, and the number of reports to be issued. Tribal purchase of a computer in the near future will be cost/effective in the long-term as various stages in the energy management plan are reached.
- 4/ If a computer is purchased, creation of a computer center should be considered where an overall data base management activity would be housed.
- 5/ If a computer is not purchased, the series of actions would be the same except they would be oriented to manual record keeping and storage (desk top calculators, filing cabinets, etc.).
- 6/ This figure is based upon a preliminary market survey conducted by Ernst & Ernst in late 1978. As noted in footnote 2, this staff person would be performing functions required under BIA's trust responsibility. Consequently, BIA funding for the position should be sought.
- 7/ This figure is based on a preliminary market survey conducted by Ernst & Ernst in late 1978.

8/ This figure is based on a preliminary market survey conducted by Ernst & Ernst in late 1978.

9/ The Pueblo has received an unsolicited proposal from a private engineering firm to develop and implement a comprehensive program at an estimated cost of (b) (4) for the first year (1978 prices).

10/ Ernst & Ernst estimate.

11/ Ernst & Ernst estimate.

ATTACHMENT A

**PHYSICAL FLOW OF ORE FROM
THE JACKPILE MINE**

ATTACHMENT A

Pueblo of Laguna

Physical Flow of Ore From the Jackpile Mine

Narrative

The following items describe the flow of the ore from the Jackpile to the Anaconda and Toll Milling plants and finally to the utility buying the enriched uranium (each item listed refers to the corresponding item on the flowchart).

1. At the Jackpile mine, broken rock is taken from the underground mines and from the open pit mines and is loaded onto 23-ton trucks. The trucks are scanned by geiger counters to determine the grade of U_3O_8 (uranium oxide) and the ore bearing material is either placed in a waste dump pile or taken to one of six stockpiles ranging from .02% to .3% uranium content.
2. At the Jackpile mine, the ore is taken from the stockpiles and blended to make a specific grade of ore by processing it through a crusher mill. The ore is then moved by conveyor to the ore railroad cars (or to trucks for the Sohio mill). (A mine ore manifest report is prepared for all railroad cars loaded and a shipping lot report is prepared for all trucks loaded.)
3. The railroad cars loaded at Jackpile travel approximately 40 miles to Anaconda's processing plant at Bluewater, New Mexico. At the Anaconda plant, the railroad cars are weighed using an official railroad scale that prints weight tickets. Each railroad car carries approximately 100 tons of ore. Samples of the ore are taken and analyzed and the moisture content is entered on a moisture certificate. The dry weight of the ore is calculated by reducing the railroad car weight by the moisture content. The moisture content of the ore is usually 8 to 12%. This calculated dry weight is the official tons on which Laguna is paid a royalty. The ore is then dumped into one of three areas:
 - a. The "ore pockets" (see item 4)
 - b. Anaconda's stockpile (see item 7)
 - c. Kerr-McGee's stockpile (see item 8)

4. If the ore is to be processed immediately by the Bluewater plant, it is dumped into one of four "ore pockets" depending on the approximate ore grade as determined at the mine. The ore is taken from the various ore pockets and fed into the grinding (or ball) mill. The plant is designed to process an ore grade of .15% and to process approximately 6,000 tons per day. In the ball mill, the ore is crushed and mixed with water to form a slurry. A machine automatically takes a sample of the slurry continuously (one sample every two minutes). At the end of 24 hours, about nine gallons of sample has been accumulated. This sample is taken to the lab to be chemically assayed and the percent of U_3O_8 is entered on the daily assay sheet. This is the official assay on which the tribe is paid a royalty. Only about half the sample is required for the chemical test; the balance of the sample is retained for six months.

The ore is run through the ball mill in 1,000-ton (10 railroad car) batches. It is thus possible to relate the 24-hour chemical assay to the railroad car weights.

5. From the ball mill, the ore slurry is pumped to the leach tanks where sulfuric acid and other chemicals are introduced to dissolve the uranium and force it into the liquid portion of the slurry. The slurry goes to the CCD circuit (settle tanks) where the mud is washed seven times to remove the liquid and uranium from the mud (or tailings). The tailings are pumped to an open 300-acre pond. The water is removed from the pond by evaporation.

Next, the liquid and uranium are mixed with an ion exchange agent (referred to as the organic or kerosene). This results in a 25% concentration of uranium. The uranium is neutralized to form wet yellow cake. Finally, the yellow cake is washed with water, dried and packed in drums. At this point, the yellow cake is 85% U_3O_8 .

Each drum is sampled and the preliminary moisture content and percent U_3O_8 is determined. (Note: yellow cake will pick up weight over time through oxidation.) Lots are prepared from 50-60 drums (30,000 lbs. of U_3O_8) and are shipped to the conversion plants. At this time, a preliminary invoice is prepared by Anaconda for the utility which represents 90% of the expected payment.

6. There are two conversion plants in the country: an Allied Chemical plant in Metropolis, Illinois and a Kerr-McGee plant in Gore, Oklahoma. At these plants, the uranium oxide is "enriched" and converted to uranium fluoride. The utility purchasing the uranium selects the conversion plant to be used. The uranium is never sold to the conversion plant; rather the convertors are merely agents performing a service for the utility.

At the conversion plants, a "falling stream" system is used to obtain a composite sample of the lot. A portion of this sample is sent back to Anaconda. Anaconda and the conversion plants perform independent assays on the yellow cake. The assay results are exchanged. If the assays are within certain limits, the average of the two assays is used as the final official assay from which the final bill is prepared. If the assay results do not fall within the limits, an independent umpire is requested to make an assay. It is very rare that an umpire is needed. Finally, the enriched uranium is shipped to the utility and a final invoice is prepared. Presently, Anaconda has long-term contracts with various utilities to sell uranium at a price that is considerably below true market value. The current market value for spot sales is about \$40 per pound, while long-term contracts are being made for slightly less.

7. The Anaconda plant maintains a reserve of ore at the plant to act as a buffer to assure that ore is always available to operate the plant. Periodically, certain rail cars are designated to replenish this stockpile.

The Pueblo of Laguna receives a royalty for ore that is added to the stockpile. At this point, the exact assay is not known; therefore, the royalty is based on the radiometric assay taken at the Jackpile mine. The royalty is later adjusted according to the assay taken during processing.

8. Ore designated to be processed by Kerr-McGee is dumped by the rail cars in a separate stockpile at the Bluewater plant.

Anaconda has contracted with Kerr-McGee to process (referred to as "toll milling") a certain amount of ore each month. Presently, Anaconda has fixed contracts with utilities in excess of the Bluewater plants capacity; therefore, toll milling is necessary in order for Anaconda to meet their obligations.

Trucks transport the ore to the Kerr-McGee plant. At the Kerr-McGee plant, the ball mill is completely cleaned out prior to the processing of Jackpile ore. Kerr-McGee accumulates a 50 lb. composite monthly sample of the ore processed through the ball mill. This sample is assayed independently by Anaconda and Kerr-McGee and an umpire (if required). The tribe obtains a royalty based on this assay and the pounds obtained from truck scale tickets.

Since the ore processed through the Kerr-McGee plant loses its identity with other ore processed, it is necessary to calculate the amount of yellow cake that is owed to Anaconda. This calculation is based on the pounds and grade of ore received and an assumed efficiency of the Kerr-McGee plant.

Anaconda prepares a preliminary and final invoice for all of their yellow cake shipped from Kerr-McGee to the convertor.

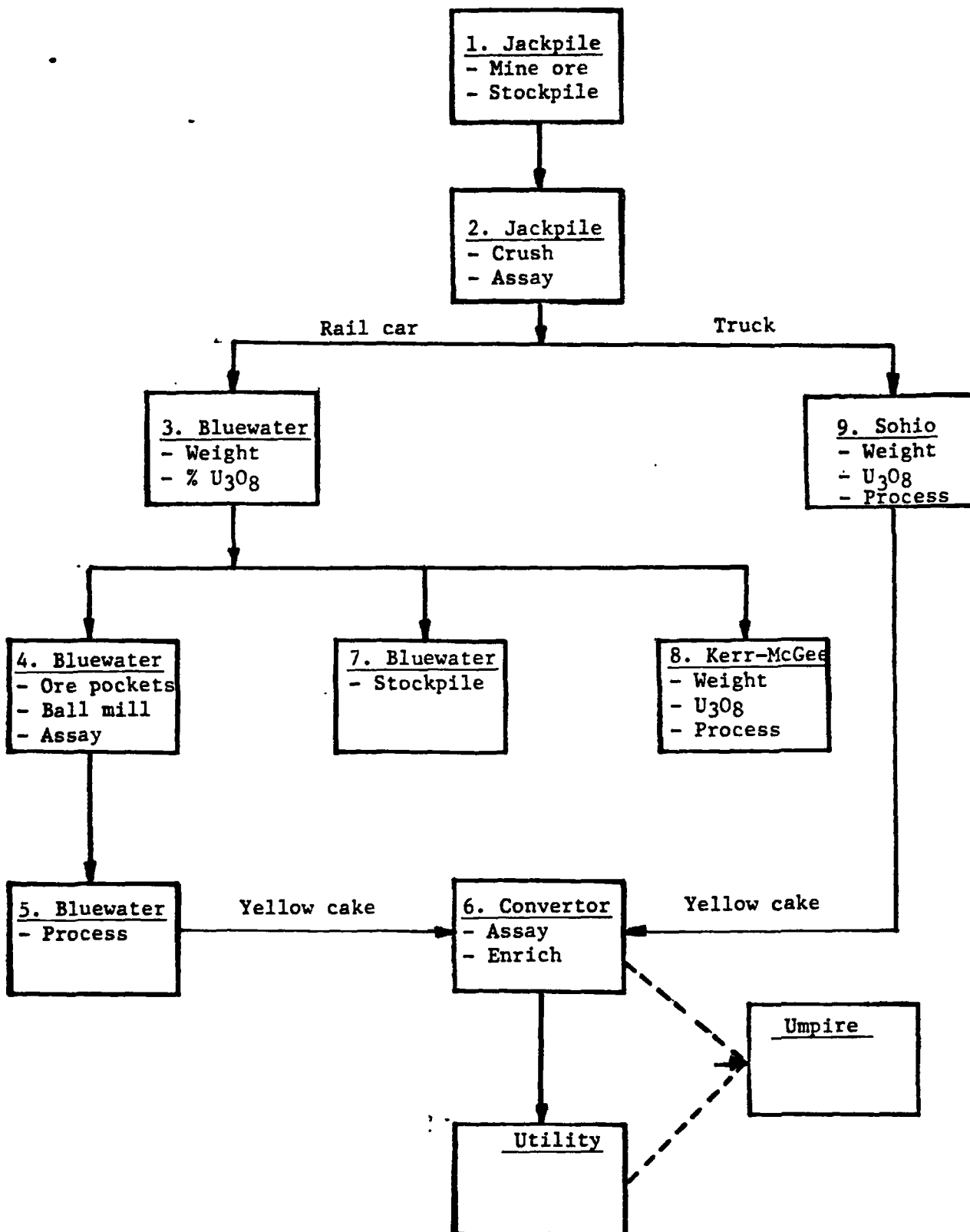
Presently, approximately 12% of the ore removed from Jackpile goes to Kerr-McGee for toll milling.

9. The Sohio trucks loaded at the Jackpile mine pass through a scanner to determine the approximate grade of the ore. The trucks take the ore to Sohio's plant where they are weighed. Each truck is required to return the scale ticket to the Jackpile mine. Sohio's method of processing the ore, conducting assays, and preparing invoices is similar to that of Kerr-McGee described in Section 8.

Presently, approximately 12% of the ore removed from the Jackpile mine goes to Sohio for toll milling.

Pueblo of Laguna

Physical Flow of Ore From
the Jackpile Mine



ATTACHMENT B

**ANACONDA'S DOCUMENT FLOW FOR THE
ROYALTY PAYMENT TO THE PUEBLO OF LAGUNA**

Exhibit 2

THE ANACONDA COMPANY
New Mexico Operations
P. O. Box 638, Grants, New Mexico

Detail of Ore Removed, Weighed and Sampled During the Month of January 1978
Pueblo of Laguna Mining Lease _____

1-2 thru 1-31-78

Page 102

DATE	LOT NO. ANACONDA SHEP.	WET POUNDS	% H2O	DRY POUNDS	ASSAY U308	POUNDS U308
1-3-78	7520	8365 880	88	7629 686	.1540	11749 72
1-4-78	7521	8247 280	84	7579 253	.1877	14226 26
1-5-78	7522	8610 760	86	7870 234	.1568	12348 80
1-6-78	7523	8377 620	91	7615 257	.1950	14849 75
1-7-78	7524	8360 500	101	7516 092	.1660	12476 71
1-8-78	7525	8281 320	106	7403 500	.1824	11356 97
1-9-78	7526	5127 000	98	4624 554	.1878	7297 55
1-9-78	7527	7292 500	93	6614 295	.1727	11422 89
1-10-78	7528	7249 680	92	6539 211	.1744	11404 38
1-10-78	7529	4751 180	91	3773 423	.1635	6245 62
1-11-78	7530	6255 980	83	5736 445	.1641	9418 93
1-11-78	7531	6123 080	83	5713 531	.1510	8627 44
1-12-78	7532	2056 320	77	1897 182	.1801	3418 27
1-12-78	7533	4114 1640	78	3818 586	.1511	5960 82
1-13-78	7534	6042 080	91	5492 251	.1561	8573 40
1-13-78	7535	6206 340	81	5703 626	.2192	12502 35
1-14-78	7536	6091 460	82	5591 561	.2050	11463 52
1-14-78	7537	5109 5780	84	4657 544	.1791	8391 66
1-15-78	7538	5074 300	89	4627 751	.1565	7260 96
1-15-78	7539	5042 560	103	4497 964	.1531	6886 33
1-16-78	7540	5070 280	93	4598 743	.1482	6815 34
1-16-78	7541	5091 100	87	4648 174	.1522	7074 52
1-17-78	7542	5113 660	94	4607 408	.1697	7818 77
1-17-78	7543	6187 220	106	553 1375	.1760	9735 22
1-18-78	7544	6173 880	91	5673 797	.1861	10558 94
1-18-78	7545	6273 440	128	5470 439	.1803	9863 70
1-19-78	7546	6255 300	93	5673 557	.1973	11193 93
1-20-78	7547	6165 980	96	5574 046	.2181	12156 99
1-20-78	7548	6207 605	78	5723 406	.1659	9472 24
1-21-78	7549	6157 860	116	5443 347	.1484	8078 22
1-22-78	7550	5541 660	103	5329 669	.1801	9598 73
1-23-78	7551	6457 580	84	5883 232	.2327	13690 26
1-23-78	7552	6150 520	113	5455 510	.2327	12694 97
1-23-78	7553	5111 220	103	4584 765	.1552	7115 36
1-24-78	7554	5152 480	94	4668 146	.1624	7581 07

THE ANACONDA COMPANY
New Mexico Operations
O. Box 638, Grants, New Mex.

January 1475

Page 2 of 2

III-90

Exhibit 3

Exhibit 4

THE ANACONDA COMPANY
NEW MEXICO OPERATIONS

MOISTURE CERTIFICATE

Date: January 3, 1978

MILL LOT #	MINE LOT #	H ₂ O %	
28238			
28239			
28240			
28241	1520	8.6	

Chief Chemist R. D. Warner

Exhibit 5

THE ANACONDA COMPANY - NEW MEXICO OPERATIONS

JACKPILE-PAGUATE MINE ORE MANIFEST

PAGUATE LOT NO. _____

JACKPILE LOT NO. 7529

Date Loaded: 1-10-78

Date Received: 1-10-78

SPECIAL 1ST NO. _____

Date Shipped: 1-10-78

Date Weighed: _____

No.	Grade	Labeled Car Wt.	Est. Tcn	Car Number	Scale Ticket No.	Net Weight	No.	Grade	Labeled Car Wt.	Est. Tcn	Car Number	Scale Ticket No.	Net Weight
1	.33	264256	104	81732	3	J-11	29	.17	263100		179507	3	
2	.35	264500	104	81458	3		30						
3	.36	263100	105	179545	3		31						
4	.35	262800	105	179550	3	2 10 1/2	32						
5	.36	263000	104	179607	3	1 1/2 1/2	33						
6	.39	263400	104	179555	3	1 1/2 1/2	34						
7	.37	263100	104	179516	3		35						
8	.22	263200	103	179549	3		36						
9	.12	263300	103	179519	3	J-9	37						
10	.13	262900	105	179522	3		38						
11	.11	263000	102	179536	3		39						
12	.12	263000	103	179575	3		40						
13	.13	263100	104	179569	3		31						
14	.12	263000	105	179525	3		42						
15	.12	199700	104	179238	3		43						
16	.13	264300	104	81438	3		44						
17	.12	263000	102	179605	3	1 1/2	45						
18	.01	263100	105	179566	3	1 1/2	46						
19	.09	262500	103	179525	3	2 1/2	47						
20				179550	3	1 1/2	48						
					3	1 1/2	49						
							50						
							51						

Exhibit 6

[illegible]

THE ANACONDA COMPANY
New Mexico Operations
P. O. Box 638, Grants, New Mexico

Pueblo of Laguna Mining Lease

III--95

Exhibit 8

U.S. AIR FORCE - COLUMBIA										
MAIL OUT RECEIPTS										
PAGE 1										
K-495										
Laid on K7582 DATE SHIPPED 1/12/78 DATE RECEIVED 1/12/78 DATE RECEIVED 1/12/78										
DATE	TO CAN	SCALE	BILLING	CAPACITY	NET WT	W	DAY	CHASS	TAFF	
REF	RECEIPT	RECEIPT	RECEIPTS	RECEIPTS	RECEIPTS	RECEIPTS	RECEIPTS	RECEIPTS	RECEIPTS	RECEIPTS
1/12/78	179539	226718	211140	200000	201140	6.1	105317	255660	58500	
1/12/78	179602	226777	211483	199000	201483	9.3	106777	264280	59600	
1/12/78	179524	226733	211523	199000	211523	5.2	107116	263720	60100	
1/12/78	179521	226681	211120	199000	211120	4.0	106465	274120	60000	
1/12/78	179527	226702	211221	199000	211222	5.2	107130	263220	60000	
1/12/78	179599	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179561	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179502	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	60000	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	4.1	107132	263220	59900	
1/12/78	179525	226711	211221	199000	211221	9.3	107132	263220	59900	
1										

Exhibit 9

KERR-McCEE NUCLEAR CORPORATION
Grants, New Mexico

SETTLEMENT ASSAY SHEET FOR TOLL ORE OR CONCENTRATE

Owner: The Anacaula Company

Date February 9, 1978

Material: ore

[illegible]

Comments: _____

Signed: Chief Metallurgist

Distribution:

C. F. Stanley
Tim Kamphaus, O.C.
Owner (Two Copies)
D. Tillerson

Exhibit 10

KERR-MCGEE NUCLEAR CORPORATION

FORM 1000-6

POCKET NO. 4 & 3

- WEIGHT AND ASSAY CERTIFICATE -

LOT NO. 22052

VILES

PERMIT NO.

A.E.C. LICENSE NO.

S. P. NO.

SHIPPER

CLAIM

Assay

COUNTY

STATE

DISTRICT

DATE SAMPLED

DATE WEIGHED	TRUCK NUMBER	SCALE TICKET NUMBER	GROSS WET WEIGHT	TARE WEIGHT	NET WET WEIGHT	M. O.C.	NET DRY WEIGHT
01 27 0	0212	193235	33440	37000	59340	81	46313
01 27 0	0207	193234	35100	31040	54060	76	49051
01 27 0	0236	193233	96700	37220	59480	74	54926
01 27 0	0211	193232	86720	34220	54500	75	50249
01 27 0	0234	193231	99000	37100	61900	75	57070
01 27 0	0239	193229	95520	33640	61880	74	57177
01 27 0	0237	193228	93180	32680	60500	72	55520
01 27 0	0220	193227	91200	33400	57720	70	53301
01 27 0	0212	193225	93820	33200	60620	73	56195
01 27 0	0227	193224	86380	31760	54620	61	50194
01 27 0	0236	193223	90900	37500	61400	70	57102
01 27 0	0233	193222	99720	37040	62680	74	59540
01 27 0	0239	193221	86920	33700	63220	74	54415
01 27 0	0237	193220	94980	32100	62880	70	57012
01 27 0	0211	193217	89680	33500	56180	76	51910
01 27 0	0212	193216	82240	32800	54440	70	54100
01 27 0	0220	193215	93000	33400	59600	60	54832
01 27 0	0237	193214	91100	31100	60000	77	55380
01 27 0	0234	193213	106600	37000	69600	70	64259
01 27 0	0238	193212	103120	37000	66120	73	61161
01 27 0	0234	193211	101000	34400	66600	81	61235
01 27 0	0237	193210	91760	32240	59520	62	54639
01 27 0	0212	193208	90800	37300	57480	81	52074
01 27 0	0211	193207	99340	33400	65940	84	61186
01 27 0	0220	193205	61540	32680	59660	79	54526
01 27 0	0237	193204	89060	31100	57960	76	53451
01 27 0	0238	193202	103100	36640	66440	77	61324
01 27 0	0239	193201	104180	34400	69780	87	64450
01 27 0	0237	193200	91820	32400	59420	84	53897
01 27 0	0236	193199	106320	37640	68680	76	63461
01 27 0	0211	193198	89760	32600	56460	84	52152
01 27 0	0212	193197	94420	33320	61100	76	56456
01 27 0	0220	193196	90040	32900	57140	81	52510
01 27 0	0227	193195	89500	31680	57820	84	52963
01 27 0	0231	193194	98250	36580	61770	80	56764
01 27 0	0237	193193	92560	32380	57680	81	54546
01 27 0	0239	193192	100700	33820	67880	83	61502
01 27 0	0236	193191	107860	37660	72180	84	66117
01 27 0	0211	193187	92540	32920	59620	80	54373
01 27 0	0270	193186	83760	33320	60440	80	55476
01 27 0	0212	193185	82640	33200	57360	80	54611
01 27 0	0227	193184	87980	31580	56400	84	51662
TOTAL							

U. O. ASSAY

U. O. CONTENT POUNDS

VERIFIED

OTHER ASSAY

OTHER CONTENT POUNDS

APPROVED

THE ANACONDA COMPANY
New Mexico Operations
Box 638, Grants, New Mexico

Pueblo of Laguna Mining Lease

JAN 1 THU 3A

= Sahio

EST
EST

Exhibit 12

TOLL WFE REPORT SHEET

DATE 01/02/78

CUM. WEIGHT ON CURRENT LOT AT START OF DAY 5,970,200 NET LBS. 2,965.10 NET TONS. 5,426,354 DRY LBS. 2,713.12 DRY TONS.

TICKET	LET AG.	QUOTES	LAKE	NET	CUM. NET	CUM. LOT	PERCENT	WET LBS.	CUM. DRY	CUM. DRY
		LBS.	LBS.	LBS.	LBS.		WET LBS.	LBS.		TONS
17468	ANAC 66	95,500	31,460	54,040	6,024,240	3,012.12	8.50	4,991.6	5,475,260	2,717.63
17469	ANAC 66	95,450	31,460	67,720	6,092,000	3,046.03	8.74	5,185.3	5,537,153	2,761.58
17470	ANAC 66	100,660	32,580	67,180	6,159,180	3,079.57	8.95	5,107.6	5,591,220	2,793.11
17471	ANAC 66	95,700	31,360	54,340	6,213,520	3,107.00	8.74	5,172.2	5,651,101	2,825.05
17472	ANAC 66	101,700	31,700	70,000	6,283,520	3,142.72	8.50	5,156	5,715,297	2,857.15
17473	ANAC 66	74,700	27,700	47,000	6,330,520	3,167.72	8.74	4,472.7	5,755,034	2,879.51
17474	ANAC 66	95,100	32,100	63,000	6,393,520	3,195.13	8.70	5,799.4	5,817,000	2,901.50
17475	ANAC 66	107,100	32,700	74,400	6,467,920	3,231.67	8.74	5,153	5,871,161	2,922.57
17476	ANAC 66	95,460	32,460	63,000	6,531,920	3,265.67	8.65	5,021	5,905,452	2,942.73
17477	ANAC 66	92,700	28,400	54,300	6,586,220	3,294.11	8.74	4,936	5,950,448	2,967.00
17478	ANAC 66	91,400	31,720	59,680	6,645,900	3,326.76	8.75	5,479	6,005,467	2,994.73
17479	ANAC 66	97,600	31,400	66,200	6,712,100	3,355.74	8.74	5,055	6,101,662	3,021.93
17480	ANAC 66	100,000	32,200	67,800	6,779,900	3,384.16	8.75	5,711	6,152,003	3,051.32
17481	ANAC 66	101,100	32,720	68,380	6,848,280	3,412.92	8.74	5,215	6,205,559	3,077.77
17482	ANAC 66	74,200	28,720	45,480	6,913,760	3,441.72	8.60	4,240	6,258,799	3,101.00
17483	ANAC 66	91,200	31,740	59,460	6,973,220	3,473.00	8.74	5,170	6,317,379	3,124.20
17484	ANAC 66	94,150	31,460	62,690	7,035,910	3,501.78	8.75	5,619	6,374,521	3,152.24
17485	ANAC 66	100,500	32,020	68,480	7,104,390	3,530.56	8.74	5,139	6,421,664	3,174.43
17486	ANAC 66	100,100	32,100	68,000	7,172,390	3,559.34	8.60	7,019	6,471,183	3,201.44
17487	ANAC 66	74,100	28,700	45,400	7,236,790	3,588.14	8.74	43,422	6,527,305	3,221.15
17488	ANAC 66	91,100	31,940	59,160	7,295,950	3,617.50	8.55	53,192	6,581,197	3,241.04
17489	ANAC 66	100,400	31,120	69,280	7,365,230	3,647.15	8.74	6,416	6,631,183	3,261.17
17490	ANAC 66	97,100	31,120	66,000	7,431,230	3,676.53	8.55	51,272	6,673,115	3,271.11
17491	ANAC 66	91,900	28,400	63,500	7,494,730	3,705.16	8.74	47,775	6,725,110	3,290.75
17492	ANAC 66	97,100	32,260	64,840	7,559,570	3,734.15	8.70	61,477	6,789,947	3,312.91
17493	ANAC 66	97,100	32,340	64,760	7,624,330	3,763.59	8.74	63,400	6,851,169	3,340.48
17494	ANAC 66	100,120	31,780	68,340	7,692,670	3,793.16	8.55	61,133	6,907,445	3,364.75
17495	ANAC 66	92,100	31,740	60,360	7,753,030	3,822.00	8.74	51,258	6,958,153	3,382.43
17496	ANAC 66	97,300	28,500	68,800	7,821,830	3,851.09	8.55	53,250	7,007,741	3,401.37
17497	ANAC 66	97,100	31,900	65,200	7,887,030	3,880.76	8.74	50,173	7,057,676	3,416.44
17498	ANAC 66	100,400	32,100	68,300	7,955,330	3,910.16	8.55	60,116	7,107,992	3,432.50
17499	ANAC 66	100,200	31,980	68,220	8,023,550	3,939.66	8.74	70,851	7,175,183	3,457.94
17500	ANAC 66	97,700	31,520	66,180	8,090,730	3,969.16	8.60	56,975	7,232,058	3,486.42
17501	ANAC 66	100,400	32,100	68,300	8,159,030	3,998.67	8.74	64,440	7,287,266	3,511.65
17502	ANAC 66	95,700	28,380	67,320	8,226,350	4,027.75	8.70	52,629	7,345,135	3,537.07
17503	ANAC 66	94,200	31,560	62,640	8,288,990	4,057.07	8.74	56,155	7,391,760	3,561.34
17504	ANAC 66	112,100	32,360	79,740	8,368,730	4,086.62	8.65	74,113	7,445,373	3,581.66
17505	ANAC 66	110,100	31,960	78,140	8,446,870	4,116.17	8.74	74,112	7,497,385	3,601.67
17506	ANAC 66	94,400	31,780	62,620	8,509,490	4,145.72	8.70	50,196	7,547,581	3,621.79
17507	ANAC 66	100,200	31,640	68,560	8,578,050	4,175.12	8.74	67,422	7,597,603	3,641.00

CUM. WEIGHT ON CURRENT LOT AT END OF DAY 8,537,840 NET LBS. 4,268.92 NET TONS. 7,771,603 DRY LBS. 3,645.00 DRY TONS.

TOTAL ADDED TO LOT 2,567,640 NET LBS. 1,283.82 NET TONS. 2,443,649 DRY LBS. 1,171.02 DRY TONS.

CUM. PERCENT MOISTURE 6.59

Exhibit 13

LOT NO. 73
 OPERATOR T. MANUELITO
P. LUCAS

SHIPPING LOT REPORT

DATE 1/26/73
 PAGE OF

SP. NO. P9 WET TONS 731.47 DRY TONS 678 .106

DRY TONS = WET TONS X .927

3663.27 ÷ 2000									
STOCKPILE	TRUCK	SCALE TICKET	CUM. WT.	POUNDS	TONS	COMMENTS	GROSS COUNTS	GRADE	CUM. GRA.
P-9	55	18481	3195.59	-15240	32.62	8.01	7424		
"	99	18482	3229.88	-17950	32.99	8.06	7450		
"	88	18483	3227.59	-5620	28.01	8.10	8462		
"	32	18484	5022.25	-68750	34.51	8.15	8555		
"	66	18485	4525.90	-67240	33.62	8.20	8781		
"	44	18486	4025.84	-65350	32.94	8.25	8522		
"	77	18487	3890.65	-63580	31.79	8.42	7812		
"	55	18489	3922.53	-63540	31.92	8.44	7859		
"	99	18490	3955.95	-66800	33.40	9.11	8049		
"	33	18491	3991.96	-72020	36.01	9.15	10944		
"	66	18492	4023.70	-63480	31.74	9.18	7525		
"	88	18493	4048.84	-50280	25.14	9.21	8124		
"	44	18494	4080.35	-63620	31.51	9.25	7891		
"	77	18495	4108.02	-55240	27.67	9.30	7965		
"	55	18497	4138.98	-61920	30.96	9.46	7695		
"	99	18498	4176.64	-75320	37.66	10.05	9933		
"	66	18499	4206.06	-58840	29.42	11.16	8847		
"	44	18500	4240.50	-69480	34.79	10.19	8592		
"	88	18501	4266.72	-51840	25.92	10.23	10072		
"	77	18502	4293.89	-54240	27.17	10.28	8254		
"	55	18503	4325.74	-63700	31.85	10.53	6085		
"	99	18504	4357.69	-63900	31.95	10.57	6930		
"	33	1845	4394.79	-74100	37.05	11.02	9672		
				146294.0					

Exhibit 14

- Sohio - Petroleum - (MELIL ALLEN)

L O N	D A T E	TAC ASSAY	Sohio ASSAY	SETTLEMENT	Review or Umpire
48	11/1	.210	.214	.2125	
49	11/1	.224	.225	.2245	
50	11/1	.206	.209	.2075	
51	11/2	.219	.216	.2175	
52	11/1	.173	.176	.1745	
53	11/2	.210	.207	.2085	
54	11/2	.197	.196	.1965	
55	11/2	.206	.205	.2055	
56	11/1	.201	.201	.2010	
57	11/1	.201	.199	.2000	
58	11/1	.202	.202	.2020	
59	11/1	.194	.195	.1945	
60	12/1	.170	.171	.1705	
61	12/1	.192	.194	.1930	
62	1/6	.195	.197	.1960	
63	1/6	.215	.218	.2165	
64	1/6	.200	.204	.2020	
65	1/4	.194	.193	.1935	
66	1/4	.201	.200	.2000	

Exhibit 15

THE ANACONDA COMPANY
New Mexico Operations - Grants, New Mexico

URANIUM CONCENTRATE ASSAYS

Anaconda # _____ SOHIO # 68 Date January 25, 1978

U_3O_8 %	U %	V_2O_5 %	PO_4 %	Halides %	SO_4 %	Fe %	CO_3 %	Ca %	Na %	K %	H_2O %	
0.210												
	SL			.210								
	SOHIO			.205								
	SETTLIMENT			.2075								

Chief Chemist R.D. Warner

THE ANACONDA COMPANY
New Mexico Operations

Detail of Ore Removed, Weighed and Sampled During the Month of December 1978
 Pueblo of Laguna Mining Lease _____

1-2 to 1-31-78

III-104

Exhibit 17

The Anaconda Company

ORIGINAL INVOICE

ANACONDA

660 Rannock Street Denver, Colorado 80204

ADDRESS

(303) 534-7555

DUNS 00-152-1612

MINERAL RESOURCES GROUP

INVOICE NO	BW-1	CONTRACT NUMBER
DATED	January 19, 1978	

SOLD TO The Babcock & Wilcox Company
P. O. Box 1260
Lynchburg, Virginia 24505
Attention: Mr. Frederick B. McNeil, Manager,
Systems & Fuel Purchasing

Remit To:

The Anaconda Company
Mr. C. H. Kraft, Treasurer
Time-Life Building
1271 Avenue of the Americas
New York, New York 10020

SHIP TO SAME AS SOLD TO UNLESS OTHERWISE SHOWN

SHIP TO Allied Chemical Corporation
Metropolis Sampling Plant
P. O. Box 847
Metropolis, Illinois 62960

TERMS:

Per Agreement

SHIPPED FROM		P.O. Box 638, Grants, NM 87020		DATE SHIPPED		1-10-78					
F.O.B.		Metropolis, Illinois 62960		FREIGHT		Prepaid					
				CUST. REF.		Contract dated August 8, 1973					
Savage Freight CARRIER 6303		Lot Number		BW-1		Uranium Concentrate		71 Drums		Price	
		NET WET LBS		% H ₂ O		NET DRY POUNDS		GRADE		LBS USED	
										(b)	

PROVISIONAL**FINAL****PROV. TO FINAL ADJUSTMENT****FINAL VALUE**

PROVISIONAL PAYMENT - (b)

LESS PENALTIES

I CERTIFY THAT THE URANIUM CONCENTRATE LOT DESCRIBED HEREIN HAS BEEN MINED AND PRODUCED IN THE UNITED STATES OF AMERICA.

THE ANACONDA COMPANY

BY

ENCLOSURES

AMOUNT DUE

NOTICE

TOTAL INVOICE AMOUNT

Before turning car people into condition of all tests and take complete record of
Symptoms and character. If car has more than 6000 miles or less than 10000, drivers
license of driver can expire on one of two points, first test record of one week or eight
miles, the later by air, official report is made-updated of at least majority of points
of errors. That will allow us to return cars to owner.

Tell in THE AAA-AIRIAL LIVES! BY THIS MOVIE DOES NOT PASS

We hereby certify that these reports were prepared in accordance with all applicable requirements of regulations. I am 1 of the 2 authorized signatories. One of the signatories and directors of the business before Department of Labor. My name is [redacted]

III-105

CONFIDENTIAL

POL-EPA01-0001289

Exhibit 18

The Anaconda Company

ORIGINAL INVOICE

ANACONDA

ADDRESS
660 Hancock Street Denver, Colorado 80204
(303)534-7555
MINERAL RESOURCES GROUP

DUNS 68-152-1612

INVOICE NO.	6911-59	CONTRACT NUMBER	
DATE	January 20, 1978		

Remit To:

SOLD TO General Public Utilities Corporation
260 Cherry Hill Road
Parsippany, New Jersey 07054

The Anaconda Company
Mr. C. H. Kraft, Treasurer
Time-Life Building
1271 Avenue of the Americas
New York, New York 10020

SHIP TO SAME AS SOLD TO UNLESS OTHERWISE SHOWN

SHIP TO Kerr-McGee Corporation
Sequoyah Facility
Gore, Oklahoma 74435

TERMS	Per Agreement
SHIPPED FROM Bluewater, New Mexico	DATE SHIPPED: 11-10-77
P.O. Box 636, Grants, NM 87020	FREIGHT: Prepaid
F.O.B. Gore, Oklahoma 74435	CUST. REF:

Navajo Freight Lot Number 6911-59 Uranium Concentrate 72 Drums Price

(b) (4)

LESS PENALTIES

(b) (4)

I CERTIFY THAT THE URANIUM CONCENTRATE LOT
DESCRIBED HEREIN HAS BEEN MINED AND
PRODUCED
IN THE UNITED STATES OF AMERICA.

THE ANACONDA COMPANY

BY: 

ENCLOSURES

AMOUNT DUE

NOTICE

TOTAL INVOICE AMOUNT

Before opening this invoice, the recipient of all goods and their complete receipt of
ownership and title to the goods is hereby acknowledged. The recipient shall be
liable for payment of the invoice and shall be responsible for the payment of the
invoice. The recipient shall be responsible for the payment of the invoice. The
recipient shall be responsible for the payment of the invoice. The recipient shall
be responsible for the payment of the invoice. The recipient shall be responsible
for the payment of the invoice. The recipient shall be responsible for the payment
of the invoice. The recipient shall be responsible for the payment of the invoice.

We hereby certify that these goods were produced in compliance with all applicable
regulations of Sections 2 and 3 of the Uranium Control Act, as amended, and
regulations and orders of the United States Atomic Energy Commission. The
recipient shall be responsible for the payment of the invoice.